

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and MANULIFE)	
INSURANCE COMPANY (f/k/a)	
INVESTORS PARTNER LIFE INSURANCE)	
COMPANY),)	CIVIL ACTION NO. 05-11150-DPW
)	
Plaintiffs,)	
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	

**JOHN HANCOCK'S MOTION IN LIMINE TO OVERRULE
ABBOTT'S AUTHENTICITY AND VARIOUS HEARSAY OBJECTIONS
TO ITS OWN DOCUMENTS**

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company and Manulife Insurance Company (collectively, "John Hancock" or "Hancock") hereby move this Court to overrule various objections asserted by Abbott Laboratories ("Abbott") to Hancock's list of proposed trial exhibits, on the basis that those objections needlessly and unjustifiably dispute: (1) the authenticity of Abbott's *own* documents produced in this action that clearly satisfy Fed. R. Evid. 901(a); (2) the admissibility of Abbott's *own* reports, meeting minutes, presentations and agendas that clearly qualify as "business records" under Fed. R. Evid. 803(6); and (3) the admissibility of various e-mails and other documents authored by Abbott *own* employees or agents that plainly constitute "admission[s] by party opponent" under

Fed. R. Evid. 801(d)(2). Indeed, many of the documents to which Abbott asserts objections are included on Abbott's *own list* of proposed trial exhibits in this action.

Abbott's legally groundless objections impose a substantial, additional burden on John Hancock and threaten to unnecessarily prolong the trial of this case. The Court has instructed the parties that "[c]onsultation among counsel shall have occurred well in advance of the filing date [of John Hancock's List of Exhibits on January 28, 2008] to determine whether objections will be made to proffered exhibits." Docket Nos. 178, 195 and 217. John Hancock has attempted for weeks to confer with Abbott regarding its objections in an attempt to convince Abbott to withdraw them. Ignoring the Court's direction and John Hancock's invitations, Abbott has stated that it does not have the time or resources to even *consider* withdrawing its objections until sometime after February 18, 2008. As a result, John Hancock must prepare to respond to each of Abbott's purported objections by, *inter alia*, calling additional Abbott witnesses to authenticate and lay evidentiary foundations for various trial exhibits whose authenticity and/or admissibility is beyond reasonable dispute.

For these reasons, which are addressed more fully below, Abbott's needless and unjustified evidentiary objections should be overruled.

Factual Background

On September 27, 2007, in connection with the March 3, 2008 trial of this case, the Court issued its Order Regulating Non-Jury Trial (the "Trial Order"). *See* Docket No. 178. Pursuant to that Trial Order, each party is obligated to file "[a] list of exhibits to be introduced at trial without objection," and "[a] list of marked items to be offered at trial, as to which the opposing party has reserved the right to object" Trial Order, Section II.4 at (c) and (d). The parties also are obligated to "consult[] ... well in advance of the filing date to determine whether

objections will be made to proffered exhibits.” *Id.* at (c). The Court subsequently amended the Trial Order to require, among other things, that “[n]ot later than 12/14/2007, each party shall exchange lists of . . . exhibits.” Docket No. 195.

On December 14, 2007, John Hancock served Abbott with a rough, preliminary list of proposed trial exhibits. John Hancock subsequently served Abbott with a greatly pared-down list of proposed trial exhibits on January 18, 2008. On January 23, 2008, Abbott responded to John Hancock’s pared-down exhibit list with a series of blanket objections encompassing the vast majority of the exhibits on Hancock’s list, including, for example:

- Abbott has objected on “authenticity” grounds to virtually all of proposed exhibits on Hancock’s list that had been produced from Abbott’s own files in discovery. *See* Table of Abbott- Documents That Abbott Objects To On Authenticity Grounds, attached hereto at Tab A. Furthermore, Abbott has challenged the authenticity of many of its own documents notwithstanding the fact that those documents also appear on Abbott’s preliminary list of proposed trial exhibits, which Abbott is required to file in final form on February 18, 2008. *See id.* at 65 Exhibits Shadowed In Grey Font.¹
- Abbott has objected on “hearsay” grounds to the admission of its *own* business records, such as reports, meeting minutes, presentations and agendas. *See* Table of Abbott Business Records Objected-to By Abbott On Hearsay Grounds, attached hereto at Tab B. Once again, many of these business records also appear on Abbott’s preliminary list of proposed trial exhibits. *See id.* at 51 Exhibits Shadowed In Grey Font. Examples of Abbott created business records which Abbott objects to also are attached hereto at Tab B.
- Abbott has objected on “hearsay” grounds to the admission of various e-mails authored by Abbott personnel that clearly constitute “admission[s] by party opponent” under Fed. R. Evid. 801(d)(2). *See* Table of Abbott’s Party Admissions That Abbott Claims Are Hearsay, attached hereto at Tab C. Once again, many of these exhibits also appear on Abbott’s preliminary list of proposed trial exhibits. *See id.* at 52 Exhibits Shadowed In Grey Font. Examples of party admissions which Abbott objects to also are attached hereto at Tab C and include Documents Bates numbered ABBT 326427 (Abbott personnel noting that ABT-594’s “commercial viability questionable” in November 2000), and ABBT 507866 (Abbott personnel directing a “stop [of] all developmental activities immediately” for ABT-518 just prior to the execution of the RFA).

¹ A true and accurate copy of Abbott’s current list of proposed trial exhibits is attached hereto at Tab D.

Upon reviewing this blizzard of facially improper objections to John Hancock's near-final list of exhibits, Hancock promptly invited Abbott to revisit and revise them. Abbott declined that invitation.

On January 28, 2008, pursuant to the Court's Second Amended Order Regulating Non-Jury Trial (Docket No. 217), John Hancock filed two exhibit lists: (a) a list of exhibits proposed by Hancock to which Abbott would not object to at trial; and (b) a list of exhibits proposed by Hancock to which Abbott reserved the right to object at trial. *See* Docket No. 224. Abbott continues to decline to revise and, if appropriate, withdraw its objections to the authenticity of its *own* documents, or the admissibility of its *own* business records and admissions. Notwithstanding the Court's Trial Order requiring the parties to confer and agree upon proposed trial exhibits in advance, Abbott asserts that it does not have the time or resources to even *consider* withdrawing its objections until sometime after February 18, 2008 (the filing deadline for Abbott's trial affidavits and deposition exhibits).²

Argument

Abbott cannot object to the authenticity of its own documents produced by Abbott in this action. Nor can Abbott dispute on hearsay grounds the admissibility of its business records or its party admissions. For these reasons, which are discussed more fully below, Abbott's objections should be overruled.

² Although Abbott ultimately offered to stipulate to the authenticity of the exhibits produced by Abbott in this litigation that appear on both parties' exhibit lists, it refused to even *consider* John Hancock's other concerns.

I. ABBOTT CANNOT REASONABLY DISPUTE THE AUTHENTICITY OF ITS OWN DOCUMENTS.

Fed. R. Evid. 901(a) provides that “the requirement of authentication as a condition precedent to admissibility is satisfied by evidence sufficient to support a finding that the matter in question is what the proponent claims.” In establishing the authenticity of a particular document, the proponent need not rule out “all possibilities inconsistent with authenticity, or ... prove beyond any doubt that the evidence is what it purports to be.” U.S. v. Alicea-Cardoza, 132 F.3d 1, 3 (1st Cir. 1997) (internal citation omitted). Indeed, “the standard for authentication, and hence for admissibility, is one of reasonable likelihood.” *Id.*

“When a party produces documents during discovery, they are attesting to the authenticity of those documents.” Bouriez v. Carnegie Mellon University, 2005 WL 2106582 (W.D.Pa., August 26, 2005); *see also* Hussein v. University and Community College System of Nevada, 2007 WL 4592225 (D. Nev., December 28, 2007) (“A generally accepted method of authenticating a document not included in the [Fed. R. Evid. 901(b)] list is authentication by production during discovery.”).

Applying these general rules, Abbott’s objections to the authenticity of the documents listed in the Table attached hereto at Tab A, are baseless. First, *all* of the documents listed therein were collected, Bates labeled and produced by Abbott to John Hancock in the course of this litigation. Second, as noted above, many of these documents have been identified *by Abbott* in its proposed list of exhibits for trial.

For these reasons, all of Abbott’s authenticity objections to the documents listed on Tab A should be overruled.

II. ABBOTT CANNOT REASONABLY DISPUTE THE ADMISSIBILITY OF ITS OWN BUSINESS RECORDS.

Fed. R. Evid. 803(6) provides that “business records are not excluded by the rule against hearsay ‘if kept in the course of a regularly conducted business activity, and if it was the regular practice of that business activity to make the ... record ... unless the source of the information or the method or circumstances of preparation indicate lack of trustworthiness.’” United States v. Munoz-Granco, 487 F.3d 25, 38 (1st Cir. 2007) (*quoting* Rule 803(6)). However, as discussed above, Abbott has objected to the admissibility of many of its own business records on hearsay grounds. *See* Tab B. All of these documents, which include reports, meeting minutes, presentations and agendas created by Abbott in the course of working on ABT-518, ABT-594 and ABT-773, are of the type contemplated by Fed. R. Evid. 803(6).

Furthermore, the fact that many of these documents appear on Abbott’s *own* proposed list of exhibits for trial (*see id.* at 51 Exhibits Shadowed In Grey Font) bolsters the “trustworthiness” of these documents under Fed. R. Evid. 803(6), and undermines Abbott’s purported objections to their admissibility.

For these reasons, all of Abbott’s hearsay objections to the documents listed on Tab B should be overruled.

III. ABBOTT CANNOT REASONABLY DISPUTE THE ADMISSIBILITY OF ITS OWN PARTY ADMISSIONS.

Fed. R. Evid. 801(d) provides that a “statement is not hearsay if . . . [it is] offered against a party and is (A) the party’s own statement, in either an individual or representative capacity or . . . (D) a statement by the party’s agent or servant concerning a matter within the scope of the agency or employment, made during the existence of the relationship” Significantly, courts consider “emails sent by defendant’s corporate officers or employees [to be] admissible under

the hearsay exception for admissions by a party's agent." Metro-Goldwyn-Mayer Studios, Inc. v. Grokster, Ltd., 454 F.Supp.2d 966, (C.D.Cal. 2006)³; *see also* Sea-Land Service, Inc. v. Lozen Intern., LLC, 285 F.3d 808 (9th Cir. 2002); Forest Laboratories, Inc. v. Ivax Pharmaceuticals, Inc., 237 F.R.D. 106 (D. Del. 2006); Nobody in Particular Presents, Inc. v. Clear Channel Communications, Inc., 331 F.Supp.2d 1048, 1098 (D. Colo. 2004).

Abbott nonetheless has objected to various e-mails and other documents authored by Abbott *own* employees or agents as inadmissible hearsay. *See* Tab C. However, Abbott's own statements -- such as the instruction of the head of Abbott's ABT-518 Development Team to "stop [] all developmental activities immediately" for that compound just prior to the execution of the Research Funding Agreement (*see id.* at ABBT 507866) -- clearly are admissible under Fed. R. Evid. 801(d)(2). Once again, Abbott's identification of many of these objected-to statements on its *own* proposed list of exhibits for trial (*see id.* at 52 Exhibits Shadowed In Grey Font) reinforces this conclusion.

For these reasons, all of Abbott's hearsay objections to the documents listed on Tab C should be overruled.

³ The court in Metro-Goldwyn incorrectly characterizes "admissions by a party's agent" as an "exception" to the hearsay rule when they are, in fact, non-hearsay statements. *See* Fed. R. Evid. 801(d)(2)(D).

Conclusion

For the foregoing reasons, John Hancock respectfully requests that this Court overrule the following objections by Abbott to Hancock's proposed trial exhibits: (a) Abbott's objections to the authenticity of its *own* documents, as set forth in Tab A; (b) Abbott's objections to the admission of its own business records, as set forth in Tab B, on hearsay grounds; and (c) Abbott's objections to the admission of various e-mails and other party admissions authored by Abbott personnel, as set forth in Tab C, on hearsay grounds.

Respectfully submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY and
MANULIFE INSURANCE COMPANY

By their attorneys,

/s/ Brian A. Davis

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Date: February 8, 2008

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LOCAL RULE 7.1 CERTIFICATION

I, Richard C. Abati, hereby certify that attorneys for John Hancock have conferred with opposing counsel before filing this Motion in an effort to resolve or narrow the issues presented.

/s/Richard C. Abati

Richard C. Abati

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served by electronic and overnight mail upon Peter E. Gelhaar, Esq., Donnelly, Conroy & Gelhaar, LLP, One Beacon Street, 33rd Floor, Boston, MA 02108, and Gregory D. Phillips, Munger, Tolles & Olson LLP, 355 South Grand Avenue, Los Angeles, CA 90071, on February 8, 2008.

/s/ Richard C. Abati

Richard C. Abati

TAB A

TAB A**Abbott Documents that Abbott Objects to on Authenticity Grounds**

Trial Exhibit	Date	Description	Bates Nos.
A	12/9/1999	MMPI Working Group Meeting Minutes	ABBT0053710-11
B	3/9/2000	Matrix Metalloproteinase Inhibitors Project - Discovery Development Candidate Meeting	ABBT0141929-83
C	7/14/2000	2001 Plan Assumption Memo	ABBT0037399-463
D	Aug-00	July 2000 Top Issues	ABBT0017616-19
F	11/00/2000	Information for Clinical Investigators, ABT-518	ABBT0055691-772
G	11/8/2000	Oncology Portfolio Analysis Inputs - Project List, Product Profiles and Probabilities of Technical Success - Draft for Team Review, November 8, 2000	ABBT292350, ABBT292365, ABBT302701, ABBT302721
H	1/11/2001	MMPI Working Group Meeting, Meeting Objective: ABT-518 Program Update	ABBT0045274-276
I	2/1/2001	ABT-518 Monthly Report, February 2001	ABBT0000343-48
J	2/1/2001	ABT-518 Descriptive Memorandum, February 2001	ABBT0004032-39
K	2/4/2001	Oncology Status Report	ABBT0045333-35
L	3/1/2001	ABT-518 Monthly Report, March 2001	ABBT0000349-53
N	3/8/2001	MMPI Monthly Meeting Agenda	ABBT0045253
O	3/8/2001	MMPI Working Group Meeting Minutes	ABBT300143-44
P	3/9/2001	Oncology Status Report	ABBT0045324-326
Q	3/9/2001	Letter from Tom Capetan to Dr. Nisen re: Report on ABT 518-Evaluation in Ocular Angiogenic Models	ABBT0049922-26
R	3/12/2001	Email from Philip M. Deemer to sblewitt@jhancock.com@internet re MMPI Program Update	ABBT0004031-39
S	3/12/2001	Email from Diane L. D'Amico to jhm@nki.nl re M00-235 Update	ABBT0033104
T	3/12/2001	Email from Diane L. D'Amico to jhm@nki.nl re M00-235 Update	ABBT0055172-73
U	3/13/2001	Email from Jim Looman to Azmi A. Nabulsi et al. re NKI Study	ABBT0033093
W	3/14/2001	Email from Diane L. D'Amico to l.v.beerepoot@azu.nl re M00-235: Validated PD Methods	ABBT0046350
Y	3/16/2001	Email from Philip M. Deemer to Joyce L. Devault re For Overhead	ABBT0004507-09
Z	3/19/2001	Email from Jim Looman to Diane L. D'Amico re M00-235 Update	ABBT0055205-06
AA	3/19/2001	Email from Diane L. D'Amico to Willy Jansen et al. re M00-235 Update	ABBT0033096-97
AB	3/20/2001	E-mail from Deemer to Nisen	ABBT245847
AC	3/21/2001	Email from Jim Looman to Diane L. D'Amico re Restart 518 Study	ABBT0508262
AD	3/21/2001	Email from Perry D. Nisen to Philip M. Deemer re Hancock and Alcon	ABBT246501
AE	3/22/2001	Email from Paige Gjelsten to MMPI Team re MMPI Working Group Meeting Minutes 3/8/01	ABBT300130-32, ABBT300142-44
AF	3/22/2001	Email from Philip M. Deemer to Perry D. Nisen re Hancock and Alcon	AL000403
AG	4/16/2001	E-mail from Perry D. Nisen to Azmi A. Nabulsi re:	ABBT0063627-28

Trial Exhibit	Date	Description	Bates Nos.
		DMC Project Review Meetings	
AH	5/1/2001	Monthly Highlights - Key Project Progress	ABBT0000361-65
AI	5/1/2001	ABT-518 Monthly Report, May 2001	ABBT143915.UR-20
AJ	5/2/2001	Email from Tamara L. Garavalia to Michaela L. James et al. re: ABT518	ABBT0055426
AK	5/11/2001	Oncology Status Report	ABBT0045302-304
AN	5/22/2001	Email from Perry D. Nisen to John M. Leonard re: ABT-518	ABBT0064226
AO	5/25/2001	Email from Diane L. D'Amico to Diane C. Bronson et al. re: ABT-518 Tox	ABBT0059368
AP	5/25/2001	Email from Diane L. D'Amico to Lise I. Loberg re: ABT-518 Tox	ABBT0061200
AQ	5/28/2001	Email from Diane C. Bronson to Diane L. D'Amico re: ABT-518 Tox	ABBT0057052
AR	5/28/2001	Email from Diane C. Bronson to Lise I. Loberg re: ABT-518 Tox	ABBT0155970
AS	5/29/2001	Email from Lise I. Loberg to William M. Bracken et al. re: resume ABT-518 activities: FALSE ALARM!	ABBT0157559
AT	6/4/2001	Oncology Status Report	ABBT0045296-97
AU	6/4/2001	Email from 8776893456@skytel.com to Diane L. D'Amico re: MMPI	ABBT0057906
AV	6/4/2001	Email from Thomas J. Lyons to Kenneth D. Stiles re: MMPI-Phase I Study Options	ABBT334695-97
AW	6/6/2001	Email from Lise I. Loberg to William M. Bracken et al. re: ABT-518 update	ABBT0157798-99
AX	6/7/2001	MMPI Working Group Meeting Minutes	ABBT0026340-42
AY	6/7/2001	MMPI Monthly Meeting Agenda	ABBT0045226-27
AZ	6/7/2001	MMPI Working Group Meeting Minutes	ABBT0057877-878
BA	6/14/2001	Email from Diane C. Bronson to Paige Gjølsten re: MMPI Meeting Minutes from 6/7/01	ABBT0033472-74
BB	6/21/2001	M00-235 Teleconference: Schellens Notification of Study Termination	ABBT0033089-98, 101, 104-108, 110, 113-114, 117-119
BC	7/30/2001	Email from Philip Deemer to Dan Norbeck re: MMPI	ABBT245647
BG	5/17/2002	Clinical Study Report R&D/02/118 - A Phase I Escalating Multiple Dose Study Of Matrix Metalloproteinase Inhibited (ABT-518) In Patients With Advanced Cancer; ABT-518/ Protocol Moo-235	ABBT0033583-658
BH	9/15/2005	Email from Jane A. Hoff-Smith to Suzanne Lebold et al. regarding Update on ABT-518	ABBT372504
BJ	00/00/00	Proposed Program Rationalization	ABBT0018775
BK	00/00/00	Letter from Azmi to Jim re project review with upper management on Wednesday	ABBT0507866
BN	3/9/2000	MMPI A-291518 Discovery Development Candidate Approval Slide	ABBT0141509
BP	3/9/2000	Email from Aldona T. Matalonis to hg@clinphone.com@internet re Suspend Work on Abbott M99-115 IVR Project	ABBT0150827
BQ	12/1/1998	A-173259.47: A Novel Potent, Non-Opioid Analgesic	ABBT0023920-81
BR	1/15/1999	Memo to Leonard re Meeting Minutes for Analgesia Venture Portfolio Review	ABBT0005027-37

Trial Exhibit	Date	Description	Bates Nos.
BS	2/24/1999	Email from Kacos to Boyd re Analgesia Portfolio Review, with slides	ABBT0114450-519
BT	3/12/1999	Letter from McCarthy to Meyer enclosing documents for ABT-594 European Advisory Meeting	ABBT0024357-69
BU	4/1/1999	ABT-259 Transition Strategy dated April 1999	ABBT0020594-611
BV	6/1/1999	ABT-594 Development Plan dated June, 1999	ABBT0018986-0019095
BX	11/17/1999	Email from Aldona T Matalonis to Catherine K Kacos re 3 page summary sheet for ALZA	ABBT0105015-19
BY	12/21/1999	Email from James W Thomas to Fred W Siebert et al. re 114 Sample Size	ABBT0051889
BZ	1/24/2000	Email from Christopher J Silber to Grace C Dunn et al. re Analgesia Venture Monthly Highlights	ABBT0159624
CA	1/31/2000	Abbott/NeuroSearch, Joint Research Council, January 31 - February 1, 2000	ABBT0022519-69
CB	3/1/2000	March 2000, ABT-594 Project Status Report	ABBT0004401-09
CC	4/1/2000	ABT-594 Descriptive Memorandum	ABBT0107546-551
CD	5/31/2000	Email from Marilyn J Collicott attaching site breakdown/enrollment for M99-114	ABBT0033462-67
CE	6/1/2000	June 2000, ABT-594 Project Status Report	ABBT0004422
CF	6/9/2000	Email from Marilyn Collicott to Bruce McCarthy re Updates fro M99-114 Phase IIb Meeting	ABBT0166642-43
CH	7/6/2000	Email from Tamara L Garavalia to Aldona T Matalonis et al. re M99-114 300 mcg dose group	ABBT0161395
CI	7/7/2000	Email from Steve Blewitt to Steve Cohen re Questions	ABBT0004016
CK	7/25/2000	Email from Michael Biarnesen to Aldona Matalonis re RQA Auditor Assignment for Analgesia Venture	ABBT0161644-45
CL	8/1/2000	August 2000, ABT-594 Project Status Report	ABBT0004436
CM	8/31/2000	ABT-594 Product Development Team Meeting, Minutes	ABBT0042271-75
CN	8/1/2000	ABT-594 Product Development Team Meeting, Minutes	ABBT0162183-86
CO	8/21/2000	Email from Laura Robinson to Andrea Landsberg re RE: ABT-594 Commercial Section w/Laura Robinson Input	ABBT0161930-69
CP	8/22/2000	Email from James W Thomas to Bruce McCarthy re 114 fax ae numbers	ABBT0502613
CQ	8/29/2000	Email from James Thomas to Catherine Kacos re M99-114 graph data	ABBT0080232-33
CR	8/31/2000	Email from Marilyn J Collicott to Christopher J Silber re M99-114 Extension letter	ABBT0113703-04
CS	8/31/2000	Letter from Marilyn Collicott re Protocol M99-114: A Randomized, Double-Blind, Placebo-Controlled Comparison of the Safety and Efficacy of ABT-594 to Placebo in Subjects with Painful Diabetic Neuropathy	ABBT241302
CT	9/1/2000	September 2000, ABT-594 Project Status Report	ABBT0004443-47
CU	Sep-00	September Strategy Update	ABBT0577811-34
CV	9/11/2000	Email from Christopher J Silber to Catherine K Kacos re Trip Report: Visit to Gibson, Biton, Kipnes, Hewitt	ABBT0109317-22
CW	9/26/2000	Randomized, Double-Blind, Placebo Controlled	ABBT240985-241001

Trial Exhibit	Date	Description	Bates Nos.
		Evaluation of the Safety and Efficacy of ABT-594 in Subjects with Painful Diabetic Polyneuropathy; The 594/M99-114 Study, Centralized Patient Recruitment Program	
CX	9/27/2000	Email from Andrea Landsberg to Christopher J Silber re Purdue CDA	ABBT0105034
CY	9/28/2000	Email from James W Thomas to Rebecca L Brown re ABT-594 M99-114 Slides for David with attached notes	ABBT0051892-904
DB	10/1/2000	October 2000, ABT-594 Project Status Report	ABBT0004448-54
DC	10/3/2000	Email from Andrea Landsberg to Robert J Weiland re ABT 594/963 Purdue meeting	ABBT0117782
DD	10/9/2000	Email from Marilyn J Collicott to Susan E Nunn et al. re M99-114	ABBT237155-59
DE	10/12/2000	Email from Mike Williams to Jennifer Smoter re Re: NNR documents	ABBT0118072
DF	10/24/2000	Email from Christopher J Silber to Nancy M Palbicke re Attached question list	ABBT0114445-47
DG	10/27/2000	Email from Andrea Landsberg to Christopher J Silber et al. re 594 Leiden presentation	ABBT0116819-36
DH	11/1/2000	November 2000 ABT-594 Project Status Report	ABBT0004455-59
DI	11/1/2000	Email from Robert J Weiland to Christopher J Silber re Re: Pharmacia meeting	ABBT0107163
DJ	Nov-00	November 2000 ABT-594 Status Report	ABBT0108785-790
DK	11/1/2000	Email from Bruce McCarthy to Christopher J Silber re Re: Pharmacia meeting	ABBT101893-94
DL	11/1/2000	ABT-594 Descriptive Memorandum dated November 2000	ABBT144600 UR-09
DM	11/2/2000	Email from James Sullivan to Robert J. Weiland re Re: Pharmacia meeting	ABBT0120836-37
DN	11/9/2000	Email from Bruce McCarthy to Robert J Weiland et al. re ABT-594 Partnership Strategy Meeting	ABBT0102187-88
DP	11/17/2000	PowerPoint ABT-594 Project Review	ABBT0019102-37
DQ	11/17/2000	Draft Project Review: ABT 594 Agenda	ABBT0125290-91
DR	11/22/2000	Email from Bruce McCarthy to David D Morris et al. re ABT-594 M99-114 Study Size Discussion	ABBT0109399-400
DS	11/29/2000	Email from Michael K Biarnesen to Andrea Landsberg re Re: ABT 594 forecast scenarios for BD partnering	ABBT0119091-96
DT	11/30/2000	Email from Elizabeth Kowaluk to Bryan F Cox re Re: 12/6 meeting	ABBT326427
DU	12/1/2000	December 2000 ABT-594 Project Status Report	ABBT0004660-64
DV	12/6/2000	Email from Marilyn J Collicott to Michael K Biarnesen re Re: November Monthly Project Status Report, ABT-594	ABBT242373 ABBT242394
DX	12/14/2000	Email from Marilyn J Collicott to Marian L Borgstrom et al. re Study M99-114	ABBT236951-52
DY	12/21/2000	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	ABBT0079831-34
DZ	12/21/2000	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	ABBT0080180-84
EA	12/21/2000	Email from Bruce McCarthy to Christopher J Silber re landsberg email	ABBT0106516

Trial Exhibit	Date	Description	Bates Nos.
EB	12/21/2000	Email from Jennifer Dart to Christopher J Silber et al. re Analgesia Internal Review Notes	ABBT0108041
EC	12/21/2000	Email from Bruce McCarthy to Christopher J Silber re Purdue presentation	ABBT0118174-203
EE	1/15/2001	Email from Bruce McCarthy to Christopher J Silber et al. re AEs for preterms - blinded look	ABBT0108884-85
EF	1/23/2001	ABT-594 Titration Optimization Initial Brainstorm Discussion, Agenda, January 23, 2001	ABBT0504097
EG	1/25/2001	Email from Jennifer Dart to Prioritization Meeting Attendees re APU Prioritization Meeting	ABBT0012433 ABBT0012454
EH	1/25/2001	Email from Christopher J Silber to James Sullivan re ABT-594	ABBT0102282-344
EI	2/1/2001	ABT-594 Monthly Report, February 2001	ABBT0000412-417
EJ	2/1/2001	Email from Michael K Biarnesen to Christopher J Silber et al. re Re: financial slides for Leiden meeting 2/2	ABBT0122953-59
EK	2/1/2001	ABT-594 Descriptive Memorandum, February 2001	ABBT246793-801
EL	2/2/2001	Project Review: ABT-089 and ABT-594	ABBT0002314-469
EM	2/2/2001	Draft Project Review: ABT 594, Agenda	ABBT0125335-37
EN	2/2/2001	Email from Bruce McCarthy to Elizabeth Kowaluk re DSG	ABBT0163875-76
EO	2/14/2001	Email from Bruce McCarthy to Michael K Biarnesen et al. re Re: Consideration of IV work with ABT-594	ABBT0123130
EP	2/19/2001	Email from Bruce McCarthy to Chris Silber et al. re Scientific Strategy for ABT-594/NNR Tolerability	ABBT0115991-93
EQ	2/26/2001	Email from Bruce McCarthy to Marleen Verlinden re ABT-594 Guest Speaker and Discussion	ABBT0163931
ER	2/27/2001	Email from Marleen H Verlinden to Christopher J Silber re Re: ABT-594 partnering	ABBT0114639
ES	2/27/2001	Email from Marilyn J Collicott to stherriault@rsi-inc.com enclosing M99-114 Investigation List and Early Terminations	ABBT238329-33
ET	2/28/2001	Email from Bruce McCarthy to pandrews@sghms.ac.uk re Re: abbott visit	ABBT0163996-97
EU	2/28/2001	E-mail from Marleen Verlinden re: Dr. Andrews	ABBT0556315
EV	3/1/2001	Global Pharmaceutical Discovery, Internal Review, March 2001, Book #27, Michael Meyer, D47-W, AP9A-3	ABBT0024132-53
EW	3/5/2001	ABT-594 / Pain Strategy Decision Analysis, Core Team Meeting - Minutes, 3/5/01	ABBT298380-85
EX	3/6/2001	Pain Therapeutic Area Strategy/ABT-594 Decision Analysis, Decision Frame	ABBT0115871-76
FA	3/7/2001	E-mail from Bruce McCarthy re: Dr. Andrews meeting	ABBT0164139-40
FB	3/7/2001	Email from Bruce McCarthy to Elizabeth Kowaluk re Re: Draft Decision Frame for ABT-594/Pain Strategy DSG	ABBT297525-55
FD	3/8/2001	Email from Elizabeth Kowaluk to Marleen H Verlinden et al. re ABT-594/Pain Strategy DSG - 3/5 Meeting Minutes	ABBT298379-85
FE	3/9/2001	Email from Paul Andrews to Bruce McCarthy re answers	ABBT0164141-201

Trial Exhibit	Date	Description	Bates Nos.
FF	3/12/2001	Calendar Entry - Paul Andrews, PhD: ABT-594 Guest Speaker and Discussion	ABBT0022006-08
FG	3/12/2001	Paul Andrews, PhD, Meeting Agenda	ABBT0556316
FJ	3/28/2001	Email from Susan E Nunn to Judith S Brownell re update regarding M99-114	ABBT0081607
FK	4/1/2001	ABT-594 Monthly Report for April, 2001	ABBT0000491-96
FM	4/10/2001	Email from Elizabeth Kowaluk to Keith F Hendricks et al. re Pharma Strategy Retreat on May 2-4	ABBT323300-05
FO	5/4/2001	E-mail from Jeff Drajesk with GPRD attachment	ABBT0114968-72
FQ	5/4/2001	Email from Michael D Meyer to James Sullivan re ABT-594 Memo	ABBT335154
FT	5/10/2001	Email from James W Thomas to Yiming Zhang re 594	ABBT0080471-72
FU	5/23/2001	Email from Thomas E Woidat to Micahel K Biarnesen re Re: ABT-594 2001 Transition Budget; ABT-594 Transition Proposal	ABBT364494-496 ABBT0548527-34
FV	6/18/2001	Email from Judith S Brownell to Marilyn J Collicott et al. re RELEASE OF DATABASE, M99-114 (MC114A), ABT-594	ABBT239029
FX	7/1/2001	ABT-594 Monthly Report for July, 2001	ABBT0000612-18
FY	7/30/2001	Email from Elizabeth Kowaluk to Steve C Kuemmerle re ABT-594 DSG analysis - preview meetings	ABBT317214
GA	7/31/2001	Clinical Study Report No. R&D/01/171, A Randomized, Double-Blind, Placebo-Controller, Comparison of the Safety and Efficiency of ABT-594 to Placebo in subjects with Painful Diabetic Polyneuropathy	ABBT241331-560
GB	8/6/2001	Email from Elizabeth Kowaluk to Bruce McCarthy	ABBT326352
GC	8/21/2001	ABT-594 Pharma Executive Management Committee Review	ABBT0001974-2029
GD	8/21/2001	PEC ABT-594 Decision Analysis	ABBT0165081-96
GE	9/13/2001	Probability Assessment Worksheet: 9/13/01	ABBT127868:UR
GF	9/27/2001	ABT-594 Proposal for additional Phase IIb study	ABBT0048402-33
GG	10/1/2001	ABT-594 Monthly Report for October, 2001	ABBT0000758-63
GH	10/5/2001	Email from Marilyn J Collicott to JanLips710@aol.com re Re: (no subject)	ABBT241303
GI	10/9/2001	Email from Tamara L Garavalia to Linda M Fisher re ABT-594 Not Funded	ABBT0148334
GJ	10/23/2001	DSG Highlights: October 2001	ABBT0515808-9
GK	10/24/2001	Email from Philip M Deemer to Ake L Johansson re Update	ABBT246338-44
GL	11/16/2001	Letter from Daphne Pals to Mr. Steve Blewitt re Research Funding Agreement dated as of March 13, 2001 Termination of ABT-594	ABBT0033833
GM	6/7/2002	Email from Michael D Meyer to Christopher J Silber re DDC slides	ABBT0108742-79
GN	6/13/2002	DDC: A-429202 Neuronal Nicotinic Receptor (NNR) Agonist, Discovery Development Candidate	ABBT0023982-24053
GO	6/27/2002	Email from Bruce McCarthy to Marleen H Verlinden re Questions re goals	ABBT0546449-50
GP	12/10/2002	GPRD PowerPoint Presentation	ABBT0105563-86
GR	00/00/00	Probability Assessment Worksheet	ABBT0047907-08

Trial Exhibit	Date	Description	Bates Nos.
GS	00/00/00	Letter to M99-114 study cites	ABBT0082749
GT	00/00/00	ABT-594 PowerPoint Slides (Development Plan)	ABBT0102966-68
GY	00/00/2001	2001 Plan Key Statistics Pass II	ABBT0037544
GZ	00/00/2001	2001 APU Development Cost Summary	ABBT366059
HA	11/8-9/2000	E-mail string from Bruce McCarthy	ABBT0110505-6
HB	11/30/2000	Email from Michael Biarnesen to Christopher Silber re 594 sales/cost estimate slide	ABBT0122385-86
HC	1/23/2001	Project Status from Jim Tyree's Expanded Staff Meeting	ABBT0128117-18
HD	2/13/2001	Email from Marilyn Collicott to stherriault@rsi-nc.com	ABBT242681-86
HE	10/28/2000	Investigational New Drug (IND) Annual Report (Reporting Period October 29, 1999 - October 28, 2000)	ABBT236676-729
HF	2/6/2001	Summary of Success Probabilities by Project and Franchise Portfolio Analysis (January 2001)	ABBT0012431-32
HG	8/21/2001	ABT-594 Decision Analysis - Pharmaceutical Executive Management Committee Review	ABBT0022081-92
HH	10/10/2001	Email from Bruce McCarthy to Michael Biarnesen re ABT-594 Update	ABBT245657
HI	3/5/2001	ABT-594 Decision Analysis - Core Team Meeting	ABBT329247-251
HJ	5/25/2000	Letter from Marilyn Collicott to Michael Hoffstetter	ABBT242154
HK	9/3/1999	Email from Christopher to Rosemarie Waleska re Advice	ABBT0159274
HL	3/00/01	ABT-594 Monthly Report	ABBT0000451-56
HM	10/19/2001	Email from Philip M. Deemer to Bruce McCarthy re: ABT-594 Call	ABBT245857
HN	5/00/00	Cholinergic Channel Modulation	ABBT0021817-860
HO	10/10/2001	Email from Bruce McCarthy to Michael Biarnesen	ABBT245657-660
HP	9/27/2001	ABT-594 - PEC Review Book: Proposal for additional study and background (nonstandard format)	ABBT113285.UR-315.UR
HQ	7/6/2000	ABT-594 2001 Update, Clinical Studies	ABBT144619.UR-20.UR
HR	Apr-99	ABT-773 Project Status Report	ABBT005056-63
HS	5/1/1999	ABT-773 Project Status Report for May 1999	ABBT004844-50
HT	Jun-99	Top 10 Issues	ABBT0017678-79
HU	8/1/1999	ABT-773 Project Status Report dated August 1999	ABBT0004627-36
HV	3/16/2000	Email from Tim Vanbiesen to Elizabeth Kowaluk re ABT-773 Dosing Strategy Kick-off Meeting	ABBT305783-84
HW	6/1/2000	ABT-773 Ketolide Antibiotic 2000 Strategic Marketing Plan dated June 2000	ABBT0570747-70
HX	6/5/2000	ABT-773 Descriptive Memorandum dated May 2000	ABBT246466-71
HZ	9/13/2000	Email from Gregor Bosco to Carol S. Meyer re ABT-773 Dev. Plan	ABBT0557552-57
IB	11/1/2000	November 2000 - "Top" Issues	ABBT0017833
IC	11/20/2000	Email from Belinda Hightower to Phyllis Kincaid re Clinical Hold	ABBT0556812
IF	11/28/2000	Email from Jeanne M. Fox to Lawrence E. Roebel et al. re Executive Summary of ABT-773 End-of-Phase 2 Mtg w/FDA	ABBT0558150
IG	11/29/2000	Email from Jeanne M. Fox to Rod M. Mittag et al. re Slides for 12/5 Meeting	ABBT0556816-22

Trial Exhibit	Date	Description	Bates Nos.
IH	Dec-00	December 2000 Top Issues	ABBT0017554-55
II	12/5/2000	ABT-773 Portfolio Review	ABBT0577000-168
IJ	1/1/2001	ABT-773 Monthly Report	ABBT214449
IK	1/1/2001	January 2001 ABT-773 Project Status Report	ABBT222821-27
IL	2/1/2001	ABT-773 Monthly Report	ABBT0000387-99
IN	2/12/2001	ABT-773 Update, [Monthly Report for February 12, 2001]	ABBT0576828-71
IO	2/12/2001	ABT-773 Update February 12, 2001	ABBT205042-46
IP	2/12/2001	ABT-773 Update February 12, 2001	ABBT205047-87
IQ	2/14/2001	Email from Jeanne M. Fox to James Steck re Studies to Meet Pediatric Rule Requirements	ABBT0568172
IR	2/22/2001	Email from Eugene X. Sun to Stan Bukofzer re 773 Material	ABBT204959-5046
IS	3/1/2001	ABT-773 Monthly Report for March 2001	ABBT0000428-38
IT	3/7/2001	Abbott Portfolio Review - March 7-9, 2001 re ABT-773	ABBT0013203-14
IU	3/19/2001	ABT-773 Update March 19, 2001	ABBT228099-137
IV	3/27/2001	Email from Thomas E. Woidat to William A. Brown re 773 Presentation	ABBT363844
IW	3/31/2001	Email from Marleen H. Verlinden to Eugene X. Sun re ABT-773	ABBT0571202-03
IX	Apr-01	ABT-773 April Update	ABBT0000468-78
IY	4/12/2001	ABT-773 Ph III Decision Project	ABBT116508ur-17ur
IZ	4/12/2001	Email from Thomas E. Woidat to Jennifer Dart re: Portfolio Analysis - Update with APU budgets	ABBT357615-20
JA	5/2/2001	Memo from Jeff Leiden to Stan Bukofzer, John Leonard and Eugene Sun re: First Call Report	ABBT0573479-83
JB	6/17/2001	Email to Hendricks, et al. re: Final copy of 773 decision analysis planned presentation	ABBT224941-82
JC	6/20/2001	Email from Carol S. Meyer to Ake L. Johansson, et al., re ABT 773 Talsho/Abbott Meeting - June 26th	ABBT229367-9448
JE	7/1/2001	ABT-773 Monthly Report	ABBT0000589-98
JG	9/27/2001	Email from Carol S. Meyer to Stan Bukofzer re: ABT 773 2002 Plan Powerpoint slides	ABBT229605-09
JH	Oct-01	ABT-773 Monthly Report	ABBT0000726-35
JI	10/8/2001	Abbott Portfolio Review 2002 Plan	ABBT228798-837
JJ	12/14/2001	Email from John M. Leonard to Stan Bukotzer re: December 12 PEMC Meeting Minutes	ABBT209485-86
JK	12/17/2001	Email from Thomas J. Lyons to Stan Bukotzer re: JH Annual Progress Report & Y/E LBE	ABBT0009384-88
JL	1/3/2002	Email from Stan Bukofzer to John M. Leonard, Eugene Sun re: 773 presentation	ABBT220928-53
JM	1/3/2002	Email from Eugene X. Sun to John M. Leonard, et al., re: 773 memo to Miles	ABBT231340-42
JN	1/4/2002	Email from Stan Bukofzer to Jeff M. Leiden, et al., re: ABT 773 Memo	ABBT220660-72
JQ	2/1/2002	ABT-773 Monthly Report	ABBT0000918-927
JR	2/2/2002	E-mail from Tina Ventura re: 773 communications strategy	ABBT229753-70
JS	2/4/2002	Email from Jeff M. Leiden to Thomas J. Lyons re: 2002 773 LBE	ABBT224544-51
JT	2/9/2002	Email from Stan Bukofzer to Jeff M. Leiden re: ABT	ABBT225309-23

Trial Exhibit	Date	Description	Bates Nos.
		773 documents requested	
JU	7/11/2002	Email from Stan Bukofzer re ABT-773 Communication	ABBT203446-48
JV	9/10/2002	ABT-773 Lessons Learned Overview	ABBT222829-42
JW	Jul-04	June Highlights Memo (global outlicensing)	ABBT248011-12
JX	00/00/00	Abbott Compound Development Summaries	ABBT0094631-61
JY	3/8/2000	ABT-773 Clinical Developmnet Optimization: Analhsis of a 150mg Dose for Bronchisits and a 5-day Course of Therapy for CAP	ABBT11376.UR-427.UR
JZ	7/9/2001	Email from Steve Kuemmerle to Stan Bukofzer re ABT-773 Analysis	ABBT210063-98
KA	6/11/2003	Pain Therapeutics Program Overviews (PEC Meeting)	ABBT0102860-71, 916-19
KB	7/29/2003	Kowaluk e-mail with attached pain portfolio profile re: ABT-894	ABBT323817-30
KC	5/1/2005	ABT-894 Scientific Advistory Counsel Doc	ABBT0080815-34
KD	11/12/2006	Suzanne Lebold e-mail string re: recommend no ABT-594 outlic due to 894	ABBT371710-15
KE	1/12/2006	Email from Kevin Constable to Suzanne Lebold	ABBT279668-73
KJ		Email from Lise Loberg to William Bracken re ABT-894 IND	ABBT0155807
KK	12/14/1998	Email from Bruce McCarthy to David Ross et al re Letter to the FDA	ABBT0116076-77
KL	6/23/1999	Alternative Funding Initiatives	AL000120-131
KM	1/12/2000	Email from Thomas Freyman to Philip Deemer	ABBT246802
KO	2/7/2000	Email from Philip Deemer to Erik Zimmer et al re Hancock	ABBT245855
KR	4/5/2000	Email from Robert Weiland to Rosemarie Waleska et al re Hancock R&D Funding	ABBT246414-15
KT	6/7/2000	Email from Philip Deemer to Steve Cohen re John Hancock/Abbott Funding Collaboration	AL000198-99
KW	7/24/2000	Email from Frank Loughery to Philip Deemer et al re Hancock Deal	AL002064
KZ	8/4/2000	Email from Philip Deemer to Barbara Powell re John Hancock Slide describing John Hancock company	AL000099-102
LA	8/14/2000	Email from Steve Cohen to Julia Bouffard et al re John Hancock/Miles meeting	AL000137
LD	8/25/2000	Email from Philip Deemer to John Leonard re Hancock	AL000983
LH	10/16/2000	PPD Plan Review	ABBT0155579-80
LI	10/17/2000	Email from Daphne Pals to Brewster Lee et al re Research Funding Agreement	JH004385-461
LN	11/30/2000	MMPI Working Group Meeting Minutes	ABBT0045277-78
LO	12/1/2000	Fax from Philip Deemer to Arthur Higgins re Hancock	AL001946
LP	12/5/2000	Minutes from the D46R Senior Staff Meeting	ABBT0140316
LQ	12/15/2000	Memorandum from Steve Cohen to Dr. Jeffrey Leiden et al re 2001 Plan	ABBT0007157-74
LR	12/21/2000	2001 Plan Assumption Memo - Pass III	ABBT112985.UR-3029.UR
LS	1/11/2001	MMPI Working Group Meeting Minutes - Objective:	ABBT0045264-69

Trial Exhibit	Date	Description	Bates Nos.
		Overall Project Update	
LT	1/22/2001	Forecast Methodology and Assumptions Early Oncology Pipeline Portfolio Analysis January 2001	ABBT0012938-69
LV	1/25/2001	Email from Elizabeth Koweluk to Steve Kuemmerle et al re Summary of Success Probabilities	ABBT301935-41
LW	1/26/2001	Analgesia Venture 2001 Plan - Revised 1/26/01 to John Leonard et al	ABBT0503356-62
LX	1/26/2001	Analgesia Venture 2001 Plan - Revised 1/26/01 to John Leonard et al	ABBT144630 UR-46
LY	1/30/2001	John Hancock Life Insurance Company Research Funding Agreement - Prepared from Draft of 1/23/01	ABBT0158779-92
MA	3/1/2001	Memorandum from Xavier Frapaise to John Arnott et al re Development Portfolio Review Meeting - March 7-9	ABBT0164029-31
MB	3/2/2001	Memorandum from Matt Russell to Bob Funck et al re 2001 Plan Final Reference Package	ABBT0037509-608
MD	3/12/2001	Email from William Adams to Brewster Lee final clean and redlined versions of the Research Funding Agreement	JH010033-142
ME	3/13/2001	J. Hancock Research Funding Agreement for Abbott: Executive Summary of March 13, 2001 Agreement	AL002066-69
MF	4/1/2001	Summary of R&D Projects - 2001 April Update	ABBT140276-77 UR
MG	4/1/2001	Email from Elizabeth Kowaluk to Steve Kuemmerle et al re Success Probabilities	ABBT317221-39
MH	4/12/2001	MMPI Working Group Meeting Minutes	ABBT0026337-38
MI	4/12/2001	MMPI Monthly Meeting Agenda Objectives: To Review MMPI Project Status	ABBT0045243-45
MJ	4/20/2001	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets	ABBT127558 UR-652 UR
MK	4/26/2001	Email from Philip M. Deemer to Ron Gerlach re John Hancock Royalty Scenario	ABBT245877-79
ML	4/27/2001	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets, Addendum: Use of Productivity Index in Portfolio Selection	ABBT326405-10
MN	5/20/2001	Global Pharmaceutical Research & Development, 2001 April Update, Dr. Jeff Leiden Follow-Up Package	ABBT0037615-16
MO	5/12/2001	Email from Perry D. Nisen to Azmi A. Nabulsi re MMPI	ABBT0063636
MP	5/31/2001	Email from Diane L. D'Amico to Lise I. Loberg re MMPI Activities	ABBT0059672
MQ	6/18/2001	Email from Thomas Woidat to Kenneth Stiles re Terminated Development Projects (Draft)	ABBT352510-15
MR	6/27/2001	Email from John Leonard to Vaseern Iftekhar et al re Terminated Development Projects	ABBT334140-45
MS	7/29/2001	Email from Robert Funck to Thomas Lyons et al re Hancock - 2002	ABBT0008946-48
MT	8/22/2001	Email from Philip M. Deemer to Ake L. Johansson re Executive Briefing, Global Licensing and Business Development	ABBT246374-409
MU	8/27/2001	Email from Philip M. Deemer to Ake L. Johansson re Update of Priorities	ABBT246324-28

Trial Exhibit	Date	Description	Bates Nos.
MV	9/28/2001	Email from Denise L. Carlson to Fusako H. Bowering re Template for Outlicensing Update	ABBT245788-805
MY	12/6/2001	Memo from John M. Leonard to Jeff Leiden re Monthly Highlights - November 2001	ABBT0003473-77
NA	12/20/2001	Handwritten Note with various attachments	ABBT0007038-54
NB	12/31/2001	Memo from Philip M. Deemer to Pamela Demain re Licensing Opportunities	ABBT246490-92
NC	12/13/2002	Memo from James L. Tyree to Jeff Leiden re January 2002 Highlights	ABBT247161-63
NE	4/15/2002	Email from John M. Leonard to Thomas J. Lyons et al. re Hancock Response	ABBT225709-10
NG	5/30/2002	2002 Update, Global Pharmaceutical Research & Development	ABBT0011680-27
NJ	11/7/2002	Memo from James L. Tyree to Jeff Leiden re October 2002 Highlights; Tyree memo dated 4/7/03 re March 2003 highlights; Leonard memo dated 2/13/04 re January 2004 highlights; Tyree memo dated 6/16/04 re May 2004 highlights; Poulos memo dated 8/15/05 re July 2005 highlights; Poulos memo dated 9/12/05 re August 2005 highlights	ABBT0518029-34; ABBT336134-35; ABBT103633.UR; ABBT103643.UR; ABBT104009.UR-10.UR; ABBT336155; ABBT336157; ABBT352502-04
NK	12/20/2002	Letter from Tom Lyons to Steve Blewitt re Research Funding Agreement dated as of March 13, 2001, (a) 2002 Program Status Report and Related Cost Summary, (b) 2003 Preliminary Annual Research Plan	AL001469-79
NL	1/30/2003	Email from Thomas J. Lyons to Jeff M. Leiden re John Hancock Update	ABBT0007586-89
NX	9/28/2004	Email from Michelle L. Campbell to Chris Martinez re Status of Documents Available for Review re John Hancock Audit	ABBT0000255-56; ABBT0126645-47
NY	10/6/2004	Email from Chris Martinez to Michelle Campbell re Status of documents available for review	ABBT0126645-47
OB	12/8/2004	Email from Karen Collari Troake to Stephen D'Amore	ABBT0000151-54
OD	1/4/2005	Email from Stephen D'Amore to Michelle Campbell re John Hancock/Abbott	ABBT0126684-87
OF	1/10/2005	Global Pharmaceutical Research & Development, Hancock Collaboration, Spending by Program Chart	ABBT148376.UR, ABBT148382.UR, ABBT148379.UR, ABBT148381.UR, ABBT__0306.UR [?], ABBT0008528-30, ABBT348223, ABBT0004602
OG	1/20/2005	Email from Chris Martinez to Michelle L. Campbell re Copies of Documents	ABBT0126734
OH	1/26/2005	Email from Michelle L. Campbell to Mark Hair re Copies of Documents Flagged Today	ABBT0126490-92
OI	1/26/2005	Email from Michelle L. Campbell to Kenneth A. Wittenberg re Copies of Documents Flagged Today - Privileged and Confidential	ABBT0126767-71
OM	2/23/2005	Email from Stephen D'Amore to Michelle Campbell	ABBT0126964-65

Trial Exhibit	Date	Description	Bates Nos.
OO	3/14/2005	Medical Products Group Portfolio Management Process	ABBT269161-210
OP	3/15/2005	Email from Michelle Campbell to Mark Hair	ABBT0000280-84
OT	3/25/2005	Email from Michelle L. Campbell to Mark Hair re John Hancock Audit	ABBT0000270-71
OX	11/7/2005	Abbott Pharmaceutical R&D Metrics Analysis	ABBT248441-547
OY	1/1/2006	2006 Portfolio Sales Data	ABBT248659-929
OZ	1/20/2006	Letter from Suzanne A. Lebold to Stephen J. Blewitt re Research Funding Agreement Between Abbott Laboratories and John Hancock dated March 13, 2001	ABBT0026105-16
PA	3/23/2006	PPG R&D Review	ABBT0047220-88
PE	00/00/00	Abbott Laboratories PPD R&D Alternative Financing Analysis John Hancock Funding Scenarios	ABBT0006861-64
PF	00/00/00	80% Power Curve for Varying Effect Size for Neuropathic Pain Based on M98-833 and Gabapentin Results	ABBT0051885-88
PG	00/00/00	Internal memorandum from Steve Cohen to Jeff and Arthur attaching Hancock package with three additional schedules	ABBT006748-68
PH	00/00/00	Initial Portfolio Prioritization	ABBT0155581-87
PI	00/00/00	Growing and Enhancing World-Class Global Research and Development at Abbott, New Organizational Plan Roll-Out PowerPoint Presentation	ABBT0162922-46
PJ	00/00/00	Memo from Azmi to Jim re Project Review	ABBT0507866
PK	00/00/00	2001 APU GPRD, Hancock Deal	ABBT148440.UR ABBT148555.UR ABBT148543.UR
PL	00/00/00	2006 LRP Forecast Submission Workbook	ABBT299286-97
PO	00/00/00	Nominal and Expected Sales Forecast	JH002314-17
PT	00/00/00	Initial Portfolio Prioritization	ABBT0155602-08
PU	00/00/2001	Division Incentive Plan Goals - 2001 DIP	ABBT354864-65
QS	00/00/00	GPRD APU - J. Leiden Questions	ABBT037609-14
RP	4/14/2004	CMR International Success Rates	ABBT308584-645
RS	11/21/2002	ABT-510 Monthly Report, Post Oct 19	ABBT0007270-72
RX	3/21/2001	Email from Thomas Woidat to Mike Higgins re Proposed APU Target Adjustments	ABBT364018-20
RY	00/00/00	Cholinergic Channel Modulator (ABT-594) 2000 AGU Development cost Summary	ABBT338037 ABBT0116305 ABBT366059
RZ	00/00/00	Abbott-John Hancock Funding Collaboration	AL000059-76
SA	10/8/2001	ABT-594 Decision Analysis, Update: ABT-594 Intermediate Dose (75-125 mcg) Ph. IIb Study	ABBT0165097-104
SD	4/20/2005	Email from Kenneth Wittenberg to Amy Potthoff, et al re Meeting re Hancock audit	ABBT0036399 ABBT0008949
SE	1/21/2005	Email from Stephen D'Amore to Michelle Campbell re Documents request in July 2004 and Re-Requested on December 17, 2004	ABBT0126735-36
SK	1/16/2001	Email from Marilyn Collicott to Jschanzenback@rsi-nc.com@internet re Meeting Today	ABBT242693-99
SL	8/7/2000	Email from Andrea Landsberg to Bruce McCarthy re 594 Development Plan	ABBT0109806-39

Trial Exhibit	Date	Description	Bates Nos.
SM	10/3/2000	Email from Bruce McCarthy to Andrea Landsberg re ABT-594/963 Purdue Meeting	ABBT0107081
SN	00/00/00	Portfolio Review Meeting, March 7-9, 2001	ABBT0092919-21
SO	9/00/2000	Pharmaceuticals Strategy Update	ABBT0155493-512
SP	9/00/2000	Pharmaceuticals Strategy Update	ABBT0577835-54

TAB B

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
1	A	MMPI Working Group Meeting Minutes	HEAR AUTH IRREL
2	B	Matrix Metalloproteinase Inhibitors Project - Discovery Development Candidate Meeting	HEAR AUTH OPIN
3	C	2001 Plan Assumption Memo	HEAR AUTH
4	D	July 2000 Top Issues	HEAR AUTH
5	E	ABT-518 Transition Strategy (MMPI), August 2000	HEAR
6	F	Information for Clinical Investigators, ABT-518	AUTH HEAR
7	I	ABT-518 Monthly Report, February 2001	AUTH HEAR
8	K	Oncology Status Report	AUTH HEAR
9	L	ABT-518 Monthly Report, March 2001	AUTH HEAR
10	M	Abbott Portfolio Review, March 7-9, 2001	HEAR INC
11	O	MMPI Working Group Meeting Minutes	AUTH HEAR
12	P	Oncology Status Report	AUTH HEAR
13	Q	Letter from Tom Capetan to Dr. Nisen re: Report on ABT 518-Evaluation in Ocular Angiogenic Models	AUTH HEAR
14	AE	Email from Paige Gjelsten to MMPI Team re MMPI Working Group Meeting Minutes, 3/8/01	AUTH HEAR
15	AH	Monthly Highlights - Key Project Progress	AUTH HEAR
16	AI	ABT-518 Monthly Report, May 2001	AUTH HEAR
17	AK	Oncology Status Report	HEAR AUTH
18	AM	E-mail from Nisen to Leonard with ASCO slides	HEAR
19	AT	Oncology Status Report	AUTH HEAR
20	AX	MMPI Working Group Meeting Minutes	AUTH HEAR
21	AY	MMPI Monthly Meeting Agenda	AUTH HEAR
22	AZ	MMPI Working Group Meeting Minutes	AUTH HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
23	BB	M00-235 Teleconference: Schellens Notification of Study Termination	Contains More than One Document AUTH HEAR
24	BF	Email from Phillip M. Deemer to Bruceb@amgen.com@internet re: Licensing Opportunities	HEAR
25	BG	Clinical Study Report R&D/02/118 - A Phase I Escalating Multiple Dose Study Of Matrix Metalloproteinase Inhibited (ABT-518) In Patients With Advanced Cancer; ABT-518/ Protocol Moo-235	AUTH HEAR
26	BI	ABT-518/Total Base	HEAR
27	BL	Timeline of events occurring with Study M00-235 in the Netherlands	HEAR
28	BM	Abbott Laboratories Project Overview - ABT-518 CLOSED	HEAR
29	BN	MMPI A-291518 Discovery Development Candidate Approval Slide	INC AUTH HEAR
30	BQ	A-173259.47: A Novel Potent, Non-Opioid Analgesic	HEAR AUTH
31	BS	Email from Kacos to Boyd re Analgesia Portfolio Review, with slides	HEAR AUTH
32	BU	ABT-259 Transition Strategy dated April 1999	AUTH HEAR INC
33	BV	ABT-594 Development Plan dated June, 1999	AUTH HEAR
34	BX	Email from Aldona T Matalonis to Catherine K Kacos re 3 page summary sheet for ALZA	HEAR AUTH
35	CA	Abbott/NeuroSearch, Joint Research Council, January 31 - February 1, 2000	HEAR AUTH IRREL
36	CB	March 2000, ABT-594 Project Status Report	HEAR AUTH
37	CD	Email from Marilyn J Collicott attaching site breakdown/enrollment for M99-114	HEAR AUTH
38	CE	June 2000, ABT-594 Project Status Report	AUTH HEAR
39	CL	August 2000, ABT-594 Project Status Report	HEAR AUTH INC
40	CM	ABT-594 Product Development Team Meeting, Minutes	HEAR AUTH
41	CN	ABT-594 Product Development Team Meeting, Minutes	HEAR AUTH

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
42	CT	September 2000, ABT-594 Project Status Report	HEAR AUTH
43	CU	September Strategy Update	HEAR AUTH
44	CW	Randomized, Double-Blind, Placebo Controlled Evaluation of the Safety and Efficacy of ABT-594 in Subjects with Painful Diabetic Polyneuropathy; The 594/M99-114 Study, Centralized Patient Recruitment Program	HEAR AUTH
45	CY	Email from James W Thomas to Rebecca L Brown re ABT-594 M99-114 Slides for David with attached notes	AUTH HEAR
46	CZ	Clinical Trial Recruitment and Centralized Screening Program For Painful Diabetic Neuropathy	HEAR
47	DB	October 2000, ABT-594 Project Status Report	AUTH HEAR
48	DD	Email from Marilyn J Collicott to Susan E Nunn et al. re M99-114	HEAR AUTH
49	DG	Email from Andrea Landsberg to Christopher J Silber et al. re 594 Leiden presentation	AUTH HEAR
50	DH	November 2000 ABT-594 Project Status Report	AUTH HEAR
51	DJ	November 2000 ABT-594 Status Report	AUTH HEAR
52	DP	PowerPoint ABT-594 Project Review	AUTH HEAR
53	DS	Email from Michael K Biarnesen to Andrea Landsberg re Re: ABT 594 forecast scenarios for BD partnering	AUTH HEAR
54	DU	December 2000 ABT-594 Project Status Report	INC HEAR AUTH
55	DW	Chart and Notes re Abbott M99-114	AUTH HEAR IRREL OPIN
56	DY	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	AUTH HEAR IRREL
57	DZ	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	AUTH HEAR
58	EC	Email from Bruce McCarthy to Christopher J Silber re Purdue presentation	AUTH HEAR
59	ED	January 2001 ABT-594 Project Status Report	HEAR
60	EG	Email from Jennifer Dart to Prioritization Meeting Attendees re APU Prioritization Meeting	AUTH HEAR
61	EH	Email from Christopher J Silber to James Sullivan re ABT-594	AUTH HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
62	EI	ABT-594 Monthly Report, February 2001	AUTH HEAR
63	EJ	Email from Michael K Biarnesen to Christopher J Silber et al. re Re: financial slides for Leiden meeting 2/2	AUTH HEAR
64	EL	Project Review ABT-089 and ABT-594	HEAR AUTH
65	ES	Email from Marilyn J Collicott to stherriault@rsi-nc.com enclosing M99-114 Investigation List and Early Terminations	HEAR AUTH
66	EV	Global Pharmaceutical Discovery, Internal Review, March 2001, Book #27, Michael Meyer, D47-W, AP9A-3	AUTH HEAR
67	EW	ABT-594 / Pain Strategy Decision Analysis, Core Team Meeting - Minutes, 3/5/01	AUTH HEAR
68	EX	Pain Therapeutic Area Strategy/ABT-594 Decision Analysis, Decision Frame	AUTH HEAR
69	EY	Abbott Portfolio Review, March 7-9, 2001	HEAR INC BAD COPY
70	EZ	Portfolio Review Meeting, March 7-9, 2001	INC HEAR
71	FB	Email from Bruce McCarthy to Elizabeth Kowaluk re Re: Draft Decision Frame for ABT-594/Pain Strategy DSG	AUTH HEAR
72	FC	Building a World of Opportunities Together - Development portfolio review kick-off	AUTH HEAR
73	FD	Email from Elizabeth Kowaluk to Marleen H Verlinden et al. re ABT-594/Pain Strategy DSG - 3/5 Meeting Minutes	AUTH HEAR
74	FE	Email from Paul Andrews to Bruce McCarthy re answers	HEAR AUTH
75	FF	Calendar Entry - Paul Andrews, PhD: ABT-594 Guest Speaker and Discussion	AUTH HEAR
76	FG	Paul Andrews, PhD, Meeting Agenda	AUTH HEAR
77	FK	ABT-594 Monthly Report for April, 2001	HEAR AUTH
78	FN	PowerPoint M99-114 Study Review	HEAR
79	FP	M99-114 Study Review	HEAR
80	FU	Email from Thomas E Woidat to Michael K Biarnesen re Re: ABT-594 2001 Transition Budget; ABT-594 Transition Proposal	AUTH HEAR
81	FX	ABT-594 Monthly Report for July, 2001	AUTH HEAR
82	FZ	Clinical Study Report No. R&D/01/171, A Randomized, Double-Blind, Placebo-Controller, Comparison of the Safety and Efficiency of ABT-594 to Placebo in subjects with Painful Diabetic Polyneuropathy (signed version)	HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
83	GA	Clinical Study Report No. R&D/01/171, A Randomized, Double-Blind, Placebo-Controller, Comparison of the Safety and Efficiency of ABT-594 to Placebo in subjects with Painful Diabetic Polyneuropathy	AUTH HEAR INC
84	GC	ABT-594 Pharma Executive Management Committee Review	AUTH HEAR INC Contains More Than One Document
85	GD	PEC ABT-594 Decision Analysis	AUTH HEAR
86	GE	Probability Assessment Worksheet: 9/13/01	AUTH HEAR
87	GF	ABT-594 Proposal for additional Phase IIb study	AUTH HEAR
88	GG	ABT-594 Monthly Report for October, 2001	AUTH HEAR
89	GN	DDC: A-429202 Neuronal Nicotinic Receptor (NMR) Agonist, Discovery Development Candidate	AUTH HEAR
90	GO	Email from Bruce McCarthy to Marleen H Verlinden re Questions re goals	AUTH HEAR
91	GP	GPRD PowerPoint Presentation	HEAR AUTH
92	GR	Probability Assessment Worksheet	AUTH HEAR
93	GT	ABT-594 PowerPoint Slides (Development Plan)	HEAR AUTH
94	GY	2001 Plan Key Statistics Pass II	INC HEAR AUTH
95	GZ	2001 APU Development Cost Summary	AUTH HEAR
96	HC	Project Status from Jim Tyree's Expanded Staff Meeting	AUTH HEAR
97	HD	Email from Marilyn Collicott to stherriault@rsi-nc.com	AUTH HEAR
98	HE	Investigational New Drug (IND) Annual Report (Reporting Period October 29, 1999 - October 28, 2000)	AUTH HEAR
99	HF	Summary of Success Probabilities by Project and Franchise Portfolio Analysis (January 2001)	AUTH HEAR
100	HG	ABT-594 Decision Analysis - Pharmaceutical Executive Management Committee Review	AUTH HEAR
101	HI	ABT-594 Decision Analysis - Core Team Meeting	AUTH HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
102	HL	ABT-594 Monthly Report	AUTH HEAR
103	HN	Cholinergic Channel Modulation	AUTH HEAR
104	HP	ABT-594 - PEC Review Book - Proposal for additional study and background (nonstandard format)	AUTH HEAR Contains more than one document
105	HQ	ABT-594 2001 Update, Clinical Studies	AUTH HEAR
106	HR	ABT-773 Project Status Report	HEAR AUTH
107	HS	ABT-773 Project Status Report for May 1999	AUTH HEAR
108	HT	Top 10 Issues	INC AUTH HEAR
109	HU	ABT-773 Project Status Report dated August 1999	HEAR AUTH
110	HW	ABT-773 Ketolide Antibiotic 2000 Strategic Marketing Plan dated June 2000	AUTH HEAR INC
111	HZ	Email from Gregor Bosco to Carol S. Meyer re ABT-773 Dev. Plan	HEAR AUTH
112	IB	November 2000 - "Top" Issues	AUTH HEAR
113	IE	FDA Contact Report - ABT-773 End of Phase 2 Meeting	HEAR
114	IH	December 2000 Top Issues	INC AUTH HEAR
115	II	ABT-773 Portfolio Review	HEAR AUTH
116	IJ	ABT-773 Monthly Report	AUTH HEAR
117	IK	January 2001 ABT-773 Project Status Report	AUTH HEAR
118	IL	ABT-773 Monthly Report	AUTH HEAR
119	IM	ABT-773 Descriptive Memorandum dated February 2001	HEAR
120	IN	ABT-773 Update: [Monthly Report for [February 12, 2001]]	AUTH HEAR
121	IO	ABT-773 Update February 12, 2001	AUTH HEAR
122	IP	ABT-773 Update February 12, 2001	AUTH HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
123	IR	Email from Eugene X. Sun to Stan Bukofzer re: 773 Material	HEAR AUTH
124	IS	ABT-773 Monthly Report for March 2001	IRR HEAR AUTH
125	IT	Abbott Portfolio Review - March 7-9, 2001 re: ABT-773	HEAR AUTH BAD COPY
126	IU	ABT-773 Update March 19, 2001	AUTH HEAR
127	IX	ABT-773 April Update	HEAR AUTH
128	IY	ABT-773 Ph III Decision Project	HEAR AUTH
129	JB	Email to Hendricks, et al. re: Final copy of 773 decision analysis planned presentation	AUTH HEAR INC
130	JC	Email from Carol S. Meyer to Ake E. Johansson, et al. re: ABT-773 Taisho/Abbott Meeting - June 26th	AUTH HEAR
131	JD	Email from Stan Bukofzer to Jeanne M. Fox re: Final copy of 773 decision analysis planned presentation	HEAR
132	JE	ABT-773 Monthly Report	INC AUTH HEAR
133	JF	ABT-773 Decision Analysis Core Team	HEAR
134	JG	Email from Carol S. Meyer to Stan Bukofzer re: ABT 773 2002 Plan Powerpoint slides	AUTH HEAR
135	JH	ABT-773 Monthly Report	AUTH HEAR
136	JI	Abbott Portfolio Review 2002 Plan	AUTH HEAR
137	JQ	ABT-773 Monthly Report	AUTH HEAR
138	JR	E-mail from Tina Ventura re: 773 communications strategy	AUTH HEAR
139	JT	Email from Stan Bukofzer to Jeff M. Leiden re: ABT 773 documents requested	AUTH HEAR
140	JV	ABT-773 Lessons Learned Overview	AUTH HEAR
141	JX	Abbott Compound Development Summaries	HEAR AUTH
142	JY	ABT-773 Clinical Developmnet Optimization: Analhsis of a 150mg Dose for Bronchisits and a 5-day Course of Therapy for CAP	AUTH HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
143	KA	Pain Therapeutics Program Overviews (PEC Meeting)	INC HEAR AUTH IRREL
144	KC	ABT-894 Scientific Advisory Counsel Doc	HEAR AUTH
145	LN	MMPI Working Group Meeting Minutes	AUTH HEAR
146	LP	Minutes from the D46R Senior Staff Meeting	AUTH HEAR
147	LQ	Memorandum from Steve Cohen to Dr. Jeffrey Leiden et al re 2001 Plan	AUTH HEAR
148	LR	2001 Plan Assumption Memo - Pass III	AUTH HEAR
149	LS	MMPI Working Group Meeting Minutes - Objective: Overall Project Update	HEAR AUTH
150	LT	Forecast Methodology and Assumptions Early Oncology Pipeline Portfolio Analysis January 2001	HEAR AUTH
151	LV	Email from Elizabeth Koweluk to Steve Kuemmerle et al re Summary of Success Probabilities	AUTH HEAR
152	LW	Analgesia Venture 2001 Plan - Revised 1/26/01 to John Leonard et al	AUTH HEAR INC
153	LX	Analgesia Venture 2001 Plan - Revised 1/26/01 to John Leonard et al	AUTH HEAR INC
154	MB	Memorandum from Matt Russell to Bob Funck et al re 2001 Plan Final Reference Package	INC AUTH HEAR
155	MC	Portfolio Review Meeting - March 7-9, 2001	HEAR
156	MF	Summary of R&D Projects - 2001 April Update	AUTH HEAR
157	MH	MMPI Working Group Meeting Minutes	AUTH HEAR
158	MJ	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets	AUTH HEAR
159	ML	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets, Addendum: Use of Productivity Index in Portfolio Selection	AUTH HEAR
160	MV	Email from Denise L. Carlson to Fusako H. Bowering re Template for Outlicensing Update	AUTH HEAR
161	NG	2002 Update, Global Pharmaceutical Research & Development	AUTH HEAR

TAB B**Abbott Business Records Objected-To by Abbott on Hearsay Grounds**

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
162	OF	Global Pharmaceutical Research & Development, Hancock Collaboration, Spending by Program Chart	HEAR AUTH INC Includes more than one document.
163	OO	Medical Products Group Portfolio Management Process	HEAR AUTH IRREL
164	OX	Abbott Pharmaceutical R&D Metrics Analysis	HEAR AUTH
165	PA	PPG R&D Review	HEAR AUTH
166	PD	Project Development Timelines for ABT-518, 594, 773 and 492	HEAR INC
167	PE	Abbott Laboratories PPD R&D Alternative Financing Analysis John Hancock Funding Scenarios	HEAR AUTH
168	PF	80% Power Curve for Varying Effect Size for Neuropathic Pain Based on M98-833 and Gabapentin Results	HEAR AUTH
169	PI	Growing and Enhancing World-Class Global Research and Development at Abbott, New Organizational Plan Roll-Out PowerPoint Presentation	HEAR AUTH
170	PK	2001 APU GPRD, Hancock Deal	INC HEAR AUTH
171	PL	2006 LRP Forecast Submission Workbook	HEAR AUTH
172	PU	Division Incentive Plan Goals - 2001 DIP	HEAR AUTH IRR
173	RS	ABT-510 Monthly Report, Post Oct 19	AUTH HEAR
174	RY	Cholinergic Channel Modulator (ABT-594) 2000 AGU Development cost Summary	AUTH HEAR
175	SA	ABT-594 Decision Analysis, Update: ABT-594 Intermediate Dose (75-125 MCG) Ph. IIb Study	AUTH HEAR
176	SJ	Special Counsel Invoices to Abbott	Contains more than one document
177	SK	Email from Marilyn Collicott to JSCHANZENBACH@rsi-inc.com@internet re meeting today	AUTH HEAR
178	SN	Portfolio Review Meeting, March 7-9, 2001	AUTH HEAR
179	SO	Pharmaceuticals Strategy Update	AUTH HEAR
180	SP	Pharmaceuticals Strategy Update	AUTH HEAR

MMPI WORKING GROUP MEETING MINUTES

3/8/01

Objective: Overall Project Update

Clinical Update

Azmi Nabulsi & Diane

D'Amico

- A brief summary of the Leiden Portfolio Review held 3/7/01 – 3/9/01 was presented. Questions were raised regarding ABT-518 since several competitor MMPIs have been discontinued. The team responded in support of continuing the ABT-518 program. Pre-clinically our compound differs from the competition. In addition, the competitors may have dosed too low, may not have selected the proper tumor stages, and skipped Phase II development.
- The two M00-235 sites were initiated in February. Drug was shipped to both sites and the first patient is expected 3/12/01.

Toxicology Review

Lise

Loberg

- An update of the two current toxicology studies was presented (see attached slides – Tox 030801A.xls and Tox 030801B.doc)
- Preliminary results from the three-month oral toxicity study in rats were discussed. Changes were seen in the high dose group (300 mg/kg) including decreased body weight, decreased food intake, dehydration and alopecia. The findings will be investigated further to determine whether or not there is a CNS involvement.
- The first three-month necropsy is planned for 4/10/01.
- The in-life phase of the six-week study has been completed. The process of integrating the mitochondrial function results with clinical pathology and histopathology has been initiated.

PK

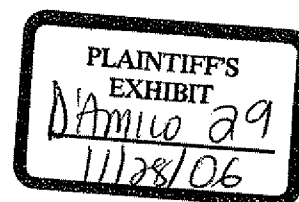
Tawakol El-Shourbagy

- The PK method validation process at Abbott is complete. NKI has not completed their PK method validation process to date. A teleconference will be scheduled within the next few days to determine the status of the PK method validation process at NKI.
- With the PK method validation complete, internal efforts will be directed towards finishing re-analysis of metabolites from toxicology studies conducted last fall; this work is needed for the IND.

PARD

John Cannon

- An update of clinical supplies was presented (see attached slides – PARD 030801.doc).
- The first 200mg capsule campaign was completed by MDS Pharma Services in Tampa FL. A lower than expected yield rate of 73% resulted in the production of 4,140 capsules. The low yield rate may be due in part to the larger than expected standard deviation variation for the empty capsules. PARD is looking into the exact cause(s).
- The rejected capsules and recovered bulk drug (deemed experimental) will be used for formulation development work. A rework step can be added to future runs to improve yield.



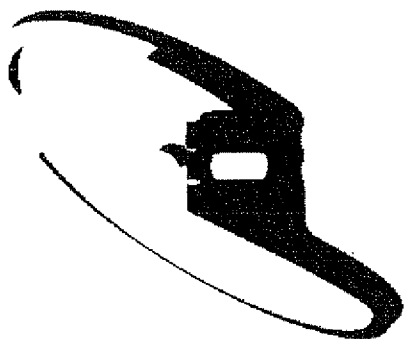
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MMPI WORKING GROUP MEETING MINUTES

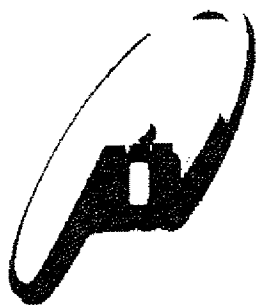
3/8/01

- The next 200mg capsule campaign is planned for June (10,000 capsules, 2 kg bulk drug). Based on the Phase I study in the Netherlands and the IND study design, the possibility of alternate capsule size (i.e., 50 or 100mg) has been discussed. PARD needs a 10-12 week lead-time if the capsule size changes from the originally planned 200mg.
- The six-week stability data on 25mg capsules stored in bottles at 40C/75% RH showed some pitting (etiology unknown). At this time, there were no concerns with capsules stored at room temperature.

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ABBT0060706



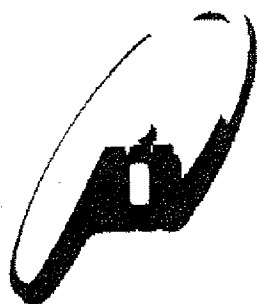
ABT-773 Update February 12, 2001



Agenda

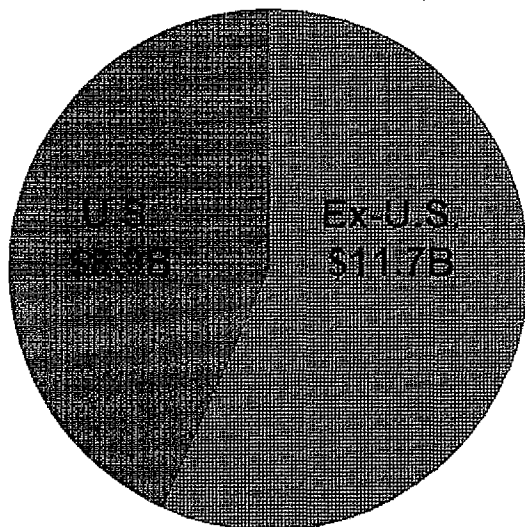
- Introduction
- The molecule
- Phase III tablet program Issues
 - QT
 - Liver Function
 - Dosing
- IV program
- Pediatric program
- Japan program

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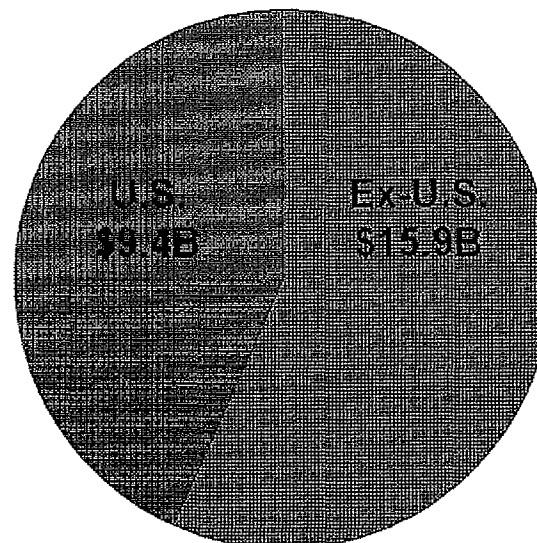


Global Antibiotic Market Sales Current vs Future Projection

1999 Global Sales \$20.6B



2005 Global Sales \$25.3B

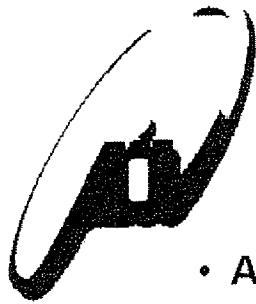


The antibiotic market is a large market and is expected to expand on a global sales basis

ABB10576830

Global Market Drivers

Negative vs Positive Drivers



- **Antibiotic Resistance**

Increasing sensitivity toward "appropriate use" may have negative impact on usage ↓

Requires new agents to keep ahead of resistant pathogens; substitution of older generic agents with newer branded agents ↑

- **Patent Expirations**

May increase price sensitivity and bargaining power of MCOs ↓

Use of generic agents tend to decrease over time; obsolescence/resistance may further that trend ↑

- **Unmet Need** ↓

–Overall unmet need relatively low

–Cost, convenience, tolerability take on added importance

–Increasing use of "implied efficacy" metrics i.e. MICs, resistance surveillance, AUC/MIC, MPC, kill kinetics

- **Competition** ↓

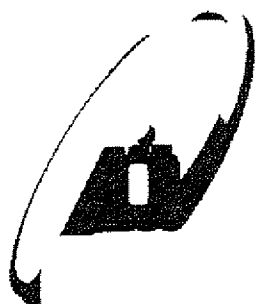
–6 NDAs/approvals in last 12 months; Avelox, Tequin, Factive, Spectracef, Ketek, Zyvox

–Continued discovery/development activity by key competitors

–High level of promotional activity

Negative driver ↓

Positive driver ↑



Key Success Factors

U.S. vs ex-U.S.

		U.S. Assessment		Ex-U.S. Assessment	
Profile	Efficacy	++	Requires a certain baseline level of efficacy across all indications as a "ticket to entry", but is difficult to differentiate agents based on efficacy	+++	While also difficult to differentiate based on efficacy, efficacy takes on added importance with respect to regulatory approval, especially in CAP.
	Tolerability	+++	Success of Zithromax and Levaquin have redefined expectations for tolerability of new agents; agents must offer very good tolerability given numerous alternatives	++	Although important, markets are willing to bear somewhat higher incidence of adverse events, provided they are not severe (i.e. taste perversion); over time, however, AE hurdles will continue to be increased
	Convenience	+++	Zithromax and recent quinolones have moved the market toward short course therapies dosed once daily; Biaxin in 1991 represented the last major BID entrant	++	While in some cases durations are even shorter (azi 3-day AECB), market levies relatively minor penalties for BID dosing
	Resistance Claim	++	Important to leverage the overall ketolide message, and to maximize formulary access, although availability of data may be able to accomplish same end	+++	May prove critical in the regulatory decision of approvability, as well as in setting premium pricing
	Price	+	Able to set price in accordance with optimal price/demand relationship; only moderate price sensitivity in market, though this could increase with increased number of generic competitors over mid-term	+++	Pricing figures heavily into the overall profitability of the compound and is governed by merits of product profile relative to other agents.
Regulatory	Approvability	+	With data showing equivalence to comparators, is not a major area of concern	+++	Will take into consideration PK profile in addition to clinical data, which could weaken argument for approval; given the pivotal nature of CAP approval to overall compound viability, regulatory risk is magnified; will require very strong clinical data if 150 mg OD is to be supported
Profitability	COGS	+	Allows for > 90% SMM given price parity to Zithromax	++	Due to pricing constraints, COGS represents a larger issue; current estimates are 76% SMM at launch rising to 87% peak
	Price	+	Assumes price parity to Zithromax	+++	Profile may limit optimal pricing

+ Minor Factor

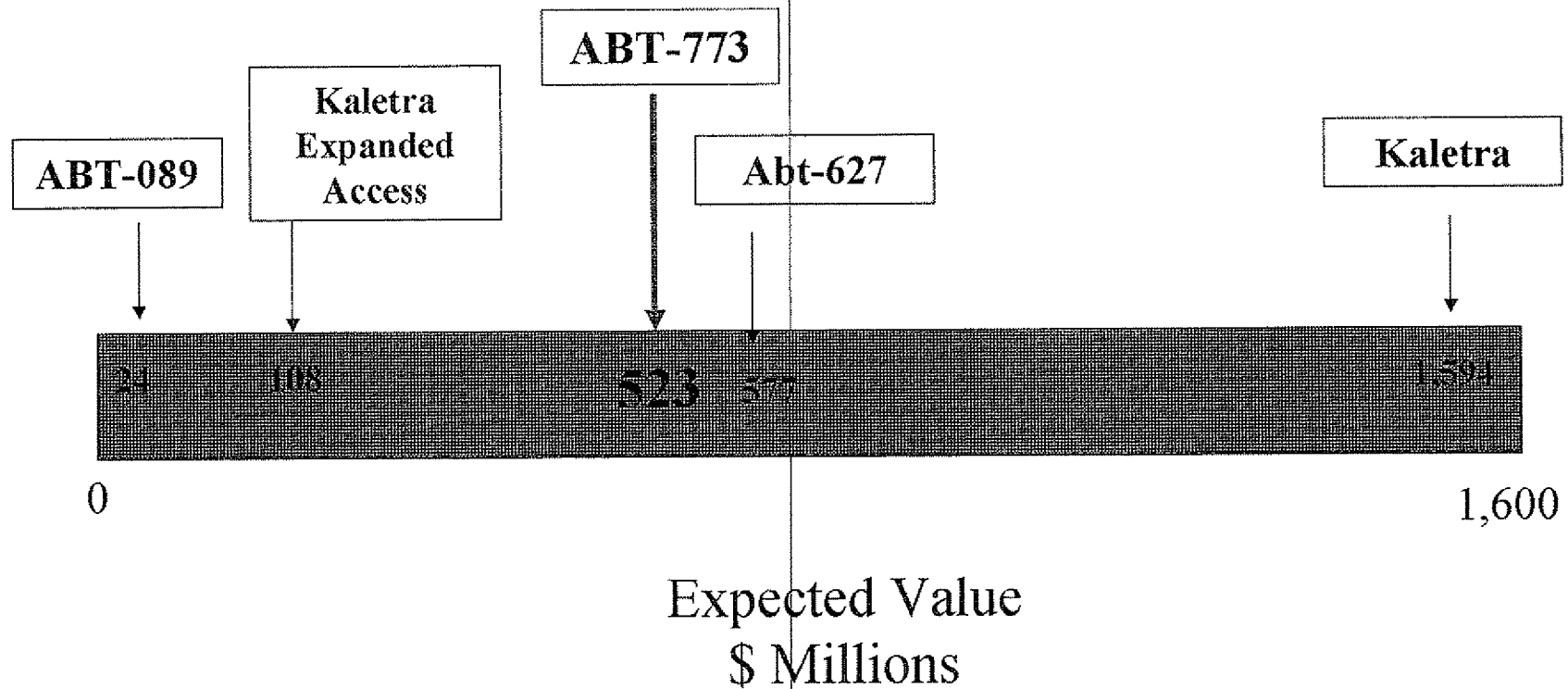
++ Moderate Factor

+++ Major Factor

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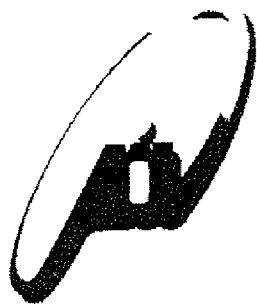


ABT-773 Comparison with other funded projects in 2001 Plan Portfolio



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ABT-773 Comparison with other funded projects in 2001 Plan Portfolio

Portfolio Productivity Analysis

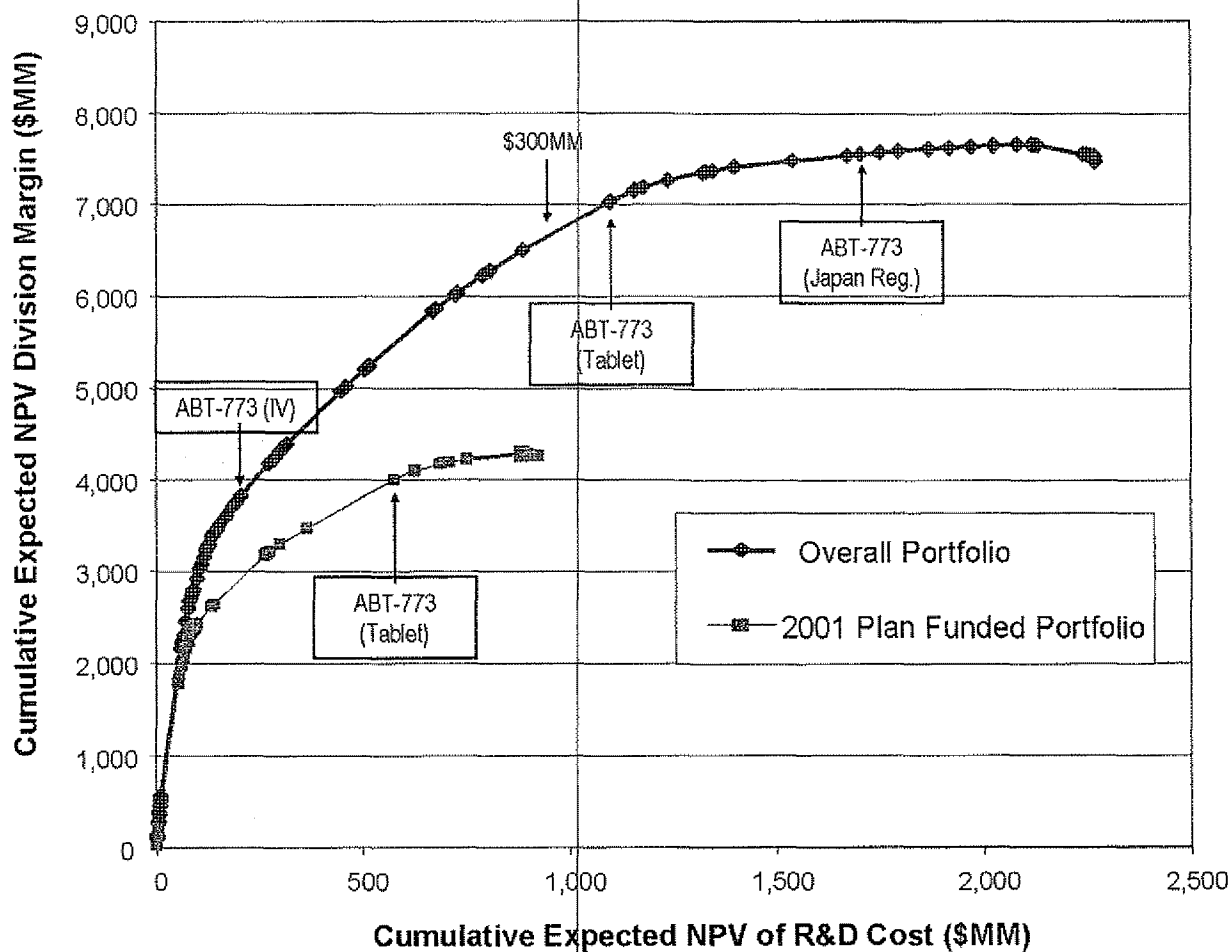
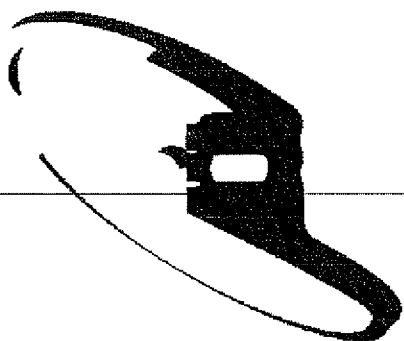
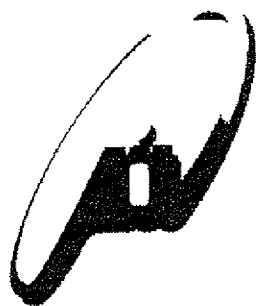


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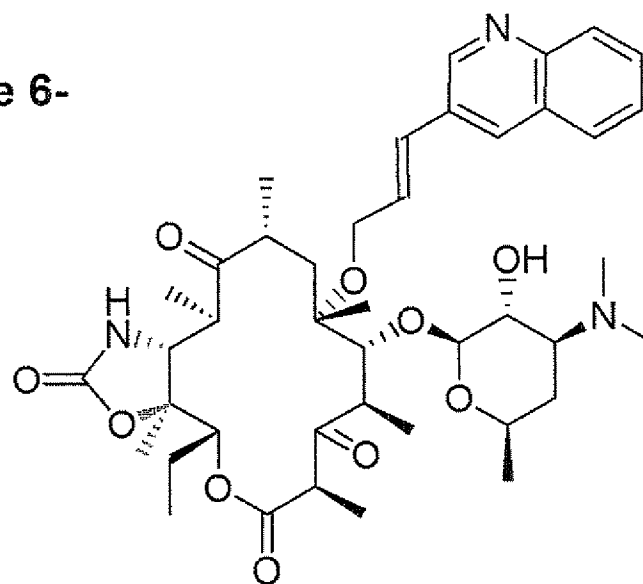
ABT-773

The Molecule



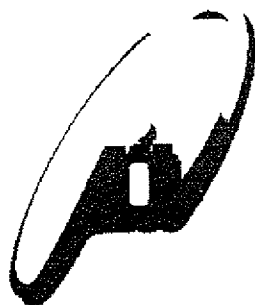
ABT-773 Ketolide

- Quinolylallyl propenyl moiety at the 6-0 -position
- Keto group at the 3-position
- Carbamate group at the 11, 12-position

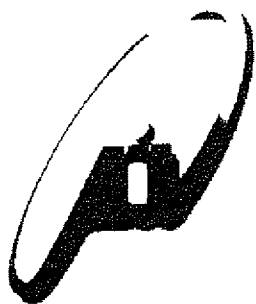


ABT-773

ABT-773 Ketolide



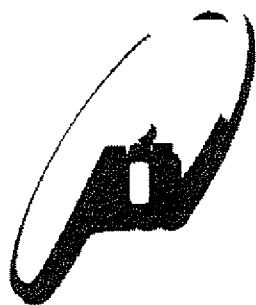
- **Ketolides are a Novel Class of Antimicrobial**
 - Active includes key respiratory tract infection pathogens including macrolide and penicillin resistant *S. pneumoniae* and *S. pyogenes*
 - Bactericidal activity
 - Prolonged post antibiotic effect
 - Reduced resistance development



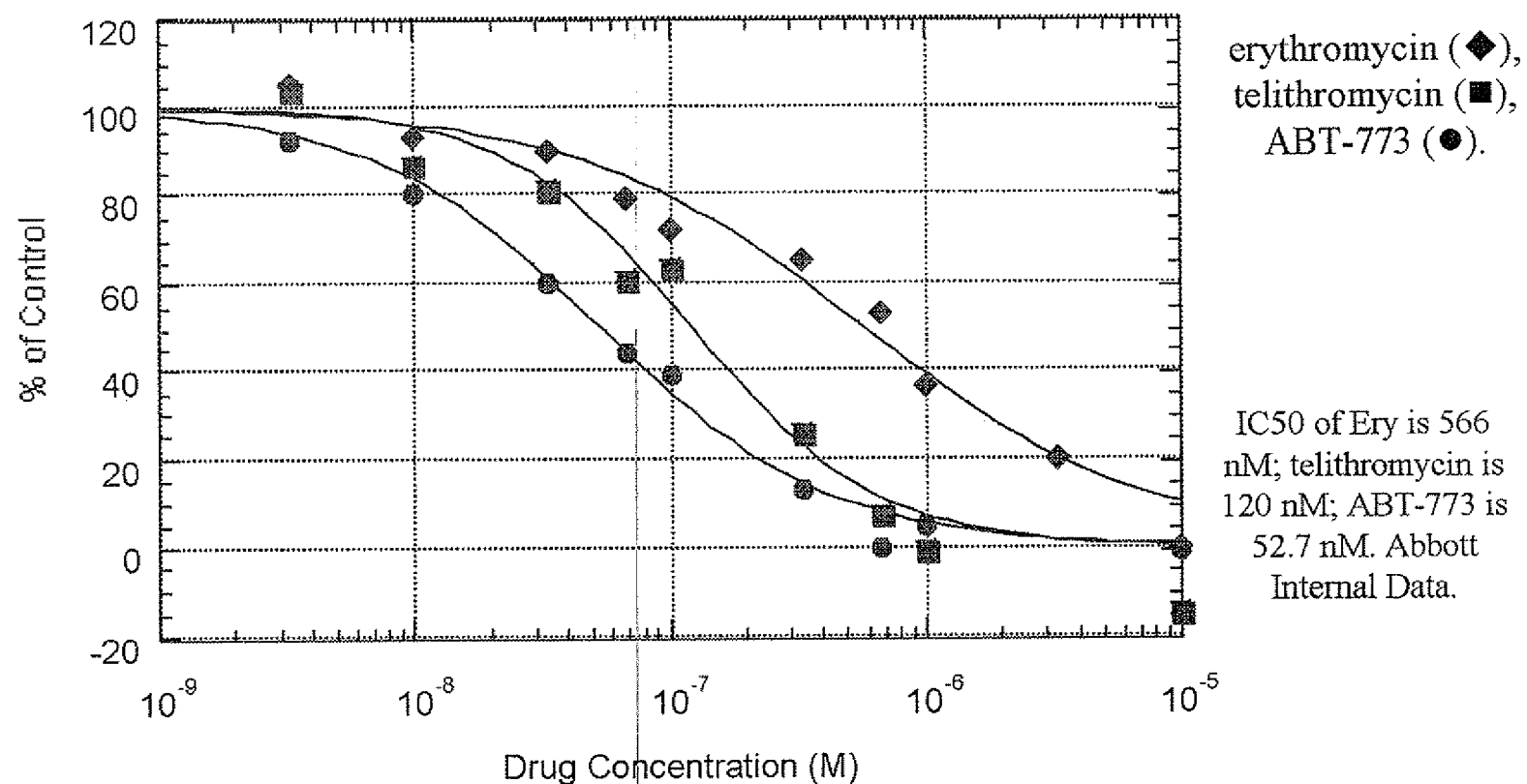
Microbiology

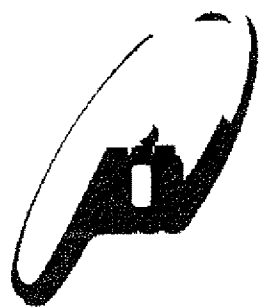
Organism	MIC ₉₀ λ g/ml			
	ABT-773	Ketek	Clari	Azi
<i>S. pneumoniae</i> ery-S	0.008	0.004	0.03	0.12
<i>S. pneumoniae</i> mef	0.12	1.0	4.0	16.0
<i>S. pneumoniae</i> erm	0.01	0.12	>32	>32
<i>S. pyogenes</i> ery-S	0.12	2.0	1.0	2.0
<i>S. pyogenes</i> ery-R	0.5	>8.0	>32	>32
<i>M. catarrhalis</i>	0.25	0.25	0.5	0.25
<i>H. Influenzae</i>	2.0	2.0	16	2.0
Legionella	2.0	2.0	0.06	1.0
<i>M. Pneumoniae</i>	<0.005	<0.005	0.008	<0.005
<i>C. Pneumoniae</i>	0.015	0.06	0.06	0.12



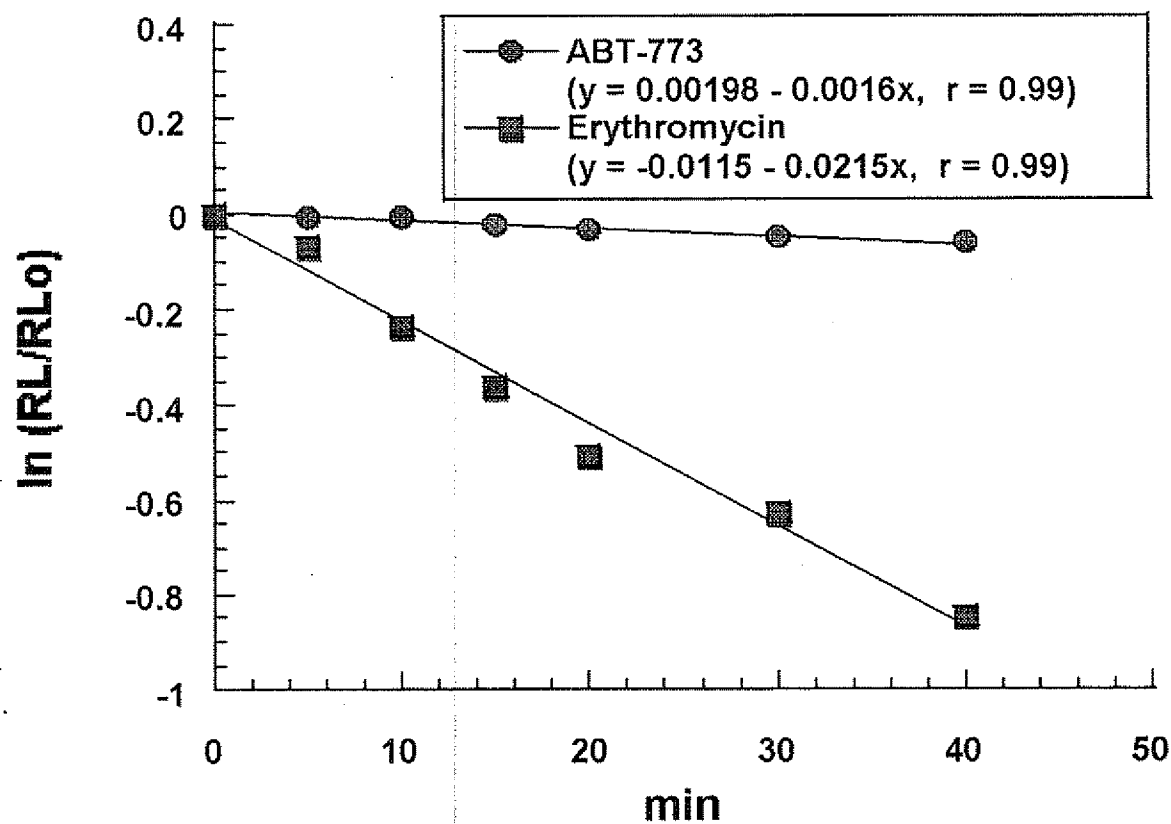


Ribosome Binding, Susceptible *S. pneumoniae*



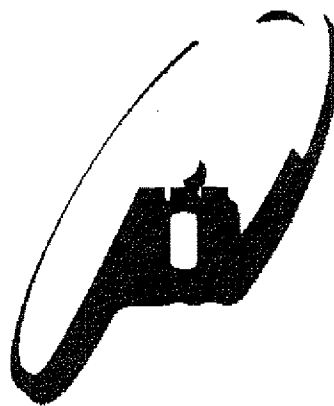


ABT-773 Displacement in Susceptible *S. pneumoniae* 2486



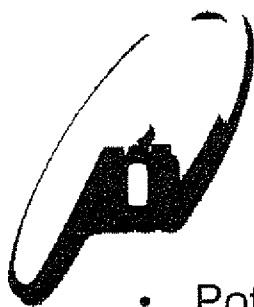
J. Capobianco et al.
ICAAC 1999, #2137.

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QTc potential and Liver Toxicity Issues

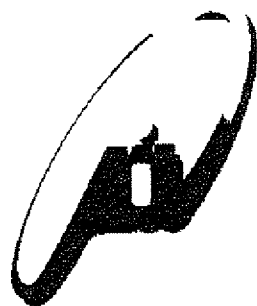
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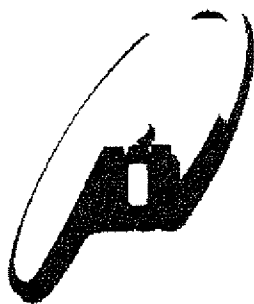
QTc Prolongation Issues

- Potential for QTc Prolongation is a hot button worldwide
 - Antimicrobial agents including macrolides and quinolones are of concern to regulatory agencies
 - ICH guidelines require data from animal models and 200 patients
 - FDA is in the process of evaluating all drug class known to have a potential for prolonging QTc (erythromycin and clarithromycin)
 - FDA has question whether ketolides behave like macrolides
 - FDA requested additional dog tox work to evaluate QTc
 - Required to include ECG monitoring in pivotal Phase 3 studies
 - FDA may require a Phase I study in patients with underlying cardiac disease
 - Some antimicrobials now contain warnings for QT prolongation
 - Telithromycin (Ketek) data residing at FDA
 - Advisory Meeting rescheduled to May 2001 probably not related to QTc concerns

QT_c Prolongation Issues ABT-773

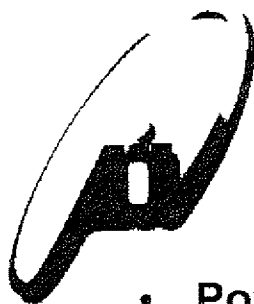


- Pre-clinical data positive for QTc dose response.
- A possible dose effect in Phase I at total daily dose ≥ 800 mg.
- No significant QT effect observed when ABT-773 was administered with the metabolic inhibitor ketoconazole. (Increased ABT-773 Cmax 5X)
- No concentration response in Phase I studies (≤ 300 mg).
- No consistent QT effect observed at clinical doses studied in Phase IIB studies. (150 mg QD to 600 mg QD)



QT_c Prolongation Issues ABT-773 Plan

- Completed pre-clinical evaluation of ABT-773
- Completed ECG monitoring of >200 patients in Phase II and III
- Continue to monitor QTc and electrolytes in Phase III programs.
- Planning FDA requested study of QTc in patients with pre-existing cardiac disease.
- IV ABT-773 Phase I study will monitor QTc carefully
- Consult with Drs. Morganroth and Moss QTc advisors.



Liver Toxicity Issues

- **Potential for liver toxicity is a concern for the FDA**
 - Recent liver toxicity seen with Trovofloxacin are of concern to regulatory agencies.
 - Gemifloxacin recently not approved by FDA because of liver toxicity concerns.
 - FDA meeting on guides to industry on how to study liver function scheduled for February 11-12, 2001

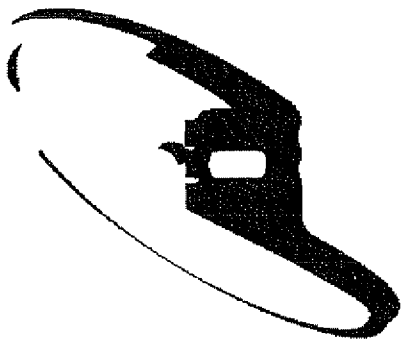
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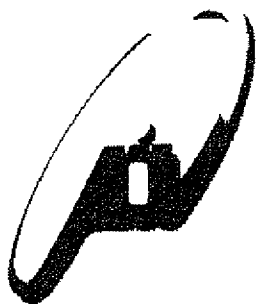
Liver Toxicity Issues for ABT-773

- Preclinical tox showed some effect on the liver function.
- Japanese in bridging study showed increased LFTs.
- No evidence of LFT issue in Western subjects.
- No evidence of dose response.
- Repeat of Japanese bridging study in Japan showed No evidence of LFT increases in Japanese or Caucasians.
- ABT-773 plan for accessing problem
 - Continue to monitor LFT in Phase III programs.
 - Jean Fox will attend FDA meeting.

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Phase III Program



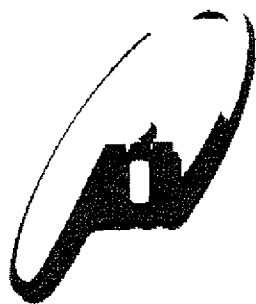
Phase III Program

Proposed Indications and Treatment Duration

<u>Infection</u>	<u>Dosage</u>	<u>Duration</u>
Pharyngitis/Tonsillitis due to:		
<i>S. pyogenes</i> *	150 mg QD	5 d
Acute bacterial sinusitis due to:		
<i>H. influenzae</i>	150 mg QD or BID	10 d
<i>M. catarrhalis</i>	150 mg QD or BID	10 d
<i>S. pneumoniae</i> **	150 mg QD or BID	10 d
Acute bacterial exacerbation of chronic bronchitis due to:		
<i>H. influenzae</i>	150 mg	5 d
<i>H. parainfluenzae</i>	150 mg	5 d
<i>M. catarrhalis</i>	150 mg	5 d
<i>S. pneumoniae</i> **	150 mg	5 d
Community-acquired pneumonia due to:		
<i>C. pneumoniae</i>	150 mg QD or BID	10 d
<i>H. influenzae</i>	150 mg QD or BID	10 d
<i>L. pneumophila</i>	150 mg QD or BID	10 d
<i>M. pneumoniae</i>	150 mg QD or BID	10 d
<i>S. pneumoniae</i> **	150 mg QD or BID	10 d

* Including macrolide-resistant strains.

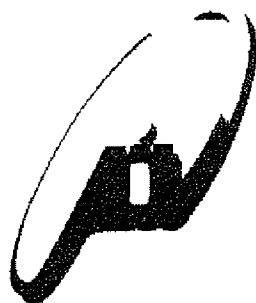
** Including penicillin-resistant and macrolide-resistant strains.



Phase III Program

Studies Started in Year 2000

Study	Indication	ABT-773 Regimen	Comparator	Number Subjects	Location
M00-223	Pharyngitis	150 mg QD 5 days	Penicillin V	185/520	US (IND)
M00-222	Pharyngitis	150 mg QD 5 days	Penicillin V	0/520	EU (Non-IND)
M00-216	ABECB	150 mg QD 5 days	Azithromycin	131/600	US, Canada IND
M00-217	ABECB	150 mg QD 5 days	Levofloxacin	0/500	EU (Non-IND)

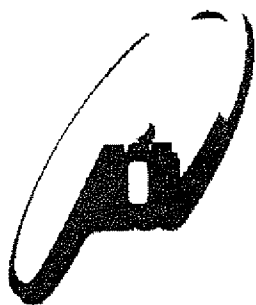


Phase III Program

Studies Started in Year 2000, Con't

Dose Finding Studies for Sinusitis/CAP:

Study	Indication	ABT-773 Regimen	Comparator	Number Subjects	Location
M00-225	Sinusitis	150 mg QD vs. 150 mg BID 10 days	None	137/500	US, EU (IND)
M00-219	CAP	150 mg QD vs. 150 mg BID 10 days	None	76/500	US, Canada, EU (IND)



SDG Analysis of Ph. III CAP Development Options

Selected
Strategy



CAP Development Strategy	Timeline impact	Incremental Cost	Relative Regulatory Risk	Potential for 150 mg. QD in CAP
1. 150 mg QD only Ph. III (Begin now)	8/2002	0	High	Yes
2. Further Phase II 150x dose ranging, then Phase III	Significant delay (~1 year)	\$5.4M	Low	Yes
3. Parallel Phase III program for 150 mg QD/150 mg BID	Significant delay (~1 year)	\$24.3M	Low	Yes
4. 150 mg BID only Ph. III (Begin now)	8/2002	0	Mod	No
5. 300 mg QD only Ph. III (Begin now)	8/2002	0	Low	No
6. Phase III open-label dose ranging	8/2002	\$7.2M	Low	Yes



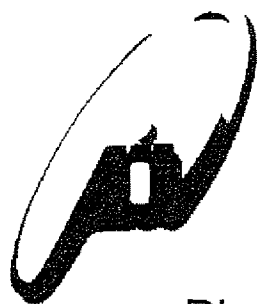
Positive
Factor



Neutral
Factor



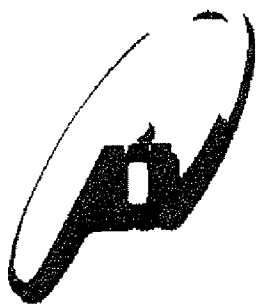
Negative
Factor



Dosing Issue

150 mg BID vs 150 mg QD: Background

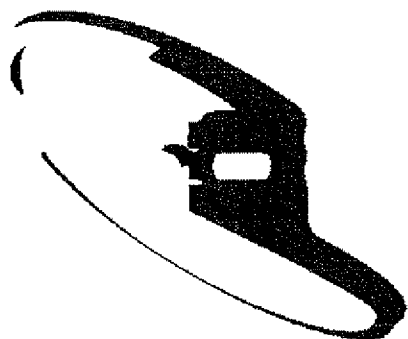
- Phase II data indicated 300 mg QD was not viable due to high levels of diarrhea (10-20%) and taste perversion (10-20%)
- Phase II ABECB and pharyngitis/tonsillitis data supported 150 mg QD
 - 150 mg QD currently being evaluated in ongoing phase III trials in these indications
- Dosing selection for CAP and sinusitis confounded by limited data
 - few bacterial isolates, particularly with H. flu, in sinusitis
 - no 150 mg arm in CAP trial
- To increase probability of correct dose selection in CAP/sinusitis, additional studies are ongoing to generate more data in these indications
 - 150 mg QD vs 150 mg BID CAP & sinusitis trials ongoing



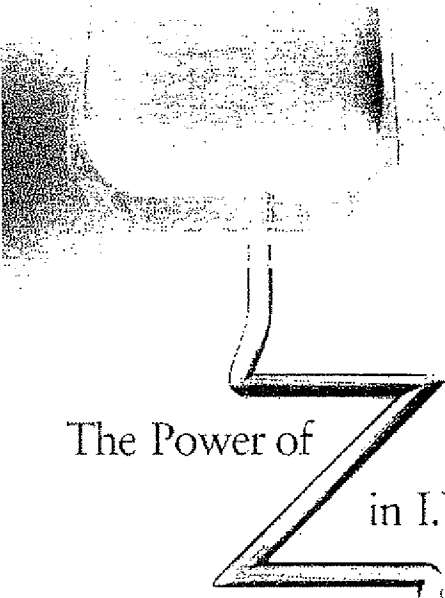
Dosing Issue

150 mg BID vs 150 mg QD: Implications of Decision

- **Regulatory and commercial environments differ dramatically between U.S. and ex-U.S.**
 - **For U.S., market:**
 - Absence of consistent QD dosing for all indications represents a significant commercial hurdle
 - Approval on indication-by-indication basis
 - Optimal strategy for U.S. may be to pursue QD dosing for CAP/sinusitis
 - **For ex-U.S. market:**
 - CAP data represents the “lynchpin” for approvability of the entire molecule, hence a conservative BID approach may result in lower regulatory/commercial risk
 - Relatively minor commercial impact of BID dosing
 - Optimal strategy for ex-U.S. may be to pursue BID dosing for CAP and perhaps sinusitis
- **A decision of 150 mg QD vs 150 mg BID in CAP & sinusitis will be made based on phase III data 2Q01**
 - Data may not show a clear “winner” due to relatively low power of studies; may be a difficult decision
 - Due to soft global flu season and protocol amendments, enrollment is behind plan and could impact timing of decision
- **A plan to have divergent US/Ex-US clinical programs in CAP/sinusitis may be required to minimize regulatory / commercial risks**
 - Cost / timeline implications



ABT-773 IV Program



The Power of
in I.V.

* Zithromax I.V. is indicated for community-acquired pneumonia due to *Streptococcus pneumoniae*, *Haemophilus influenzae*, *Legionella pneumophila*, *Moraxella catarrhalis*, *Atypis pneumoniae*, *Staphylococcus aureus*, or *Sterptococcus pneumoniae* in patients who require initial intravenous therapy.

† In a controlled study of 291 hospitalized patients with community-acquired pneumonia, Zithromax® (500 mg as a single daily dose by the intravenous route for 2 to 5 days followed by 500 mg/day by the oral route to complete 7 to 10 days of therapy) was compared with cefuroxime (2250 mg/day in three divided doses by the intravenous route for 2 to 5 days followed by 1000 mg/day in two divided doses by the oral route to complete 7 to 10 days of therapy), with or without erythromycin.

Please see brief summary of prescribing information on last page of this advertisement.

Once-daily
Zithromax® I.V.
(azithromycin for injection)

The only I.V. advanced-generation
macrolide for community-acquired
pneumonia* in adult hospitalized patients

Targeted coverage of the key pathogens of
community-acquired pneumonia

Typical	Atypical
<i>Streptococcus pneumoniae</i>	<i>Legionella pneumophila</i>
<i>Haemophilus influenzae</i>	<i>Chlamydia pneumoniae</i>
<i>Staphylococcus aureus</i>	<i>Mycoplasma pneumoniae</i>
<i>Moraxella catarrhalis</i>	

Proven as effective as
cefuroxime ± erythromycin

Early step-down therapy to oral Zithromax

Very well tolerated

The most common side effects associated with treatment in adult patients who received I.V./O Zithromax in studies of community-acquired pneumonia were gastrointestinal effects (4.3%), nausea (3.5%), abdominal pain (2.7%), and vomiting (1.1%). The most common side effects related to I.V. infusion included pain at the infusion site (6.5%) and oral inflammation (3.1%).

Zithromax is contraindicated in patients with known hypersensitivity to azithromycin, erythromycin, or any macrolide antibiotic.

Once-daily
Zithromax I.V.
(azithromycin for injection)
as Zithromax
The Power of Z in I.V.

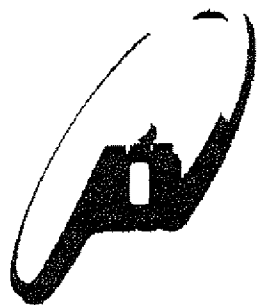


ABT-773 IV Formulation Strategic, Commercial, and Technical Value

- **Strategic Value**
 - IV represents a channel not currently served by Anti-infective Franchise
 - Leverages presence of Medical Center Reps and experience with ID community
- **Commercial Value**
 - IV availability figures favorably into decisions regarding formulary access to molecule
 - potential advantage over telithromycin, which will not have an IV
 - required to compete effectively with Zithromax, Tequin, Avelox which have IVs
 - Positive impact on tablet formulation
 - estimated \$36MM incremental to peak tablet sales due to step-down therapy
 - Enhances overall “potency” image of brand
- **Technical Value**
 - Support for *S. pneumoniae* Resistance claim
 - FDA indicated that bacteremic patients will be important to establish body of evidence for this claim
 - Provides additional information on QT effects

IV launch currently lags tablet launch by 1 year; any further delays will reduce the potential value

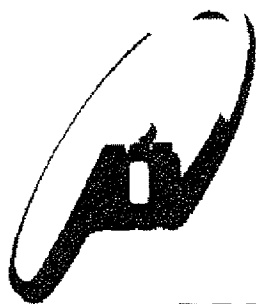
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ABT-773 IV Program Formulation Objectives

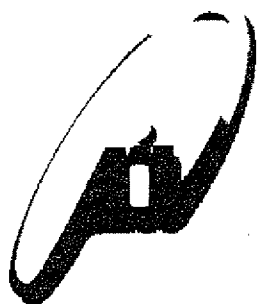
- Reconstituted solution . Once a day dosing. Low pain on injection
- Lyophilized powder, consisting of ABT-773 and a counter ion base.
- One strength, in a flip-top vial and the ADD Vantage system at launch.
- Diluent volume 100ML, with length of infusion (30 to 60 minutes) and type of diluent (Dextrose 5% and/or normal saline) TBD based on animal pain models, clinical and stability studies.

ABB10576858



ABT-773 IV Formulation PPD/HPD Funding Status

- PPD/HPD Collaboration initiated 9/99
- PPD funded Program 01/00-08/00 (\$1.4MM)
 - Formulation development (lactate salt, lyophilized powder)
 - Animal pain models
 - Two week Tox study (monkey)
- HPD funded Program 08/00-12/00 (\$0.8MM)
 - Two week Tox study (rat)
 - Clinical supplies for Phase I
 - Stability program
- 2001 funding
 - HPD first pass funding cut for 773 IV (\$7MM)
 - Milestone funding to Phase I Go/No Go (\$1MM)
- Total program development costs 2000 - 2003 (\$22.5MM)

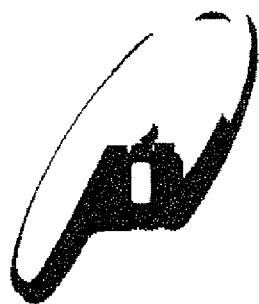


ABT-773 IV Formulation

Animal Pain Study Results

- Assessed 6 prototypes (3 different counter ions at 2 pH levels) vs clarithromycin IV and azithromycin IV
- Animal pain models showed no differentiation among all three compounds
 - Results not conclusive
 - Need to evaluate in humans
- Chose ABT-773 lactate as the prototype to test in Phase I studies based on manufacturability and stability.

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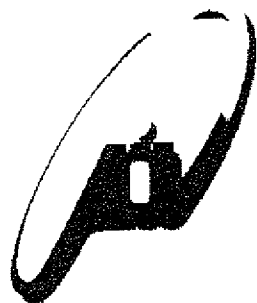
ABT-773 IV

Planned Clinical Program

With 2001 funding decision in Feb:

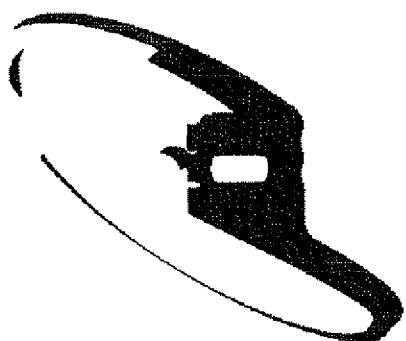
- Single Dose-rising Phase I study Apr/01
- Multiple Dose Phase I with selected dose June/01
- File US IND Oct/01
- Initiate Phase III Dec/01
 - 2 step-down CAP studies (US/Europe)
 - 2-3 days dosing
 - Two seasons to complete
- Filing Aug/03

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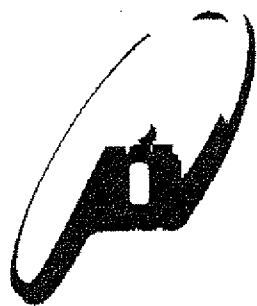
ABT 773 IV Program Summary

- **Comments**
 - Funding for '01 not available PPD/HPD
 - Go/No go could be made after Phase I based on safety profile (pain,QT,GI)
 - Milestone funding recommended (\$1MM)
 - Assuming Go, '01 budget estimated \$7MM
 - IV will help to obtain resistant *S. pneumo* claim
 - Total Program Cost 2000-2003 (\$22.5MM)



Pediatric Program

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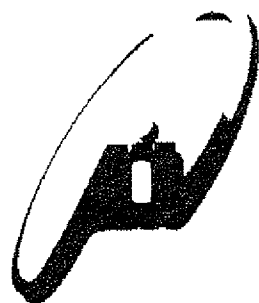


ABT-773 Pediatric Formulation

Importance to the 773 program

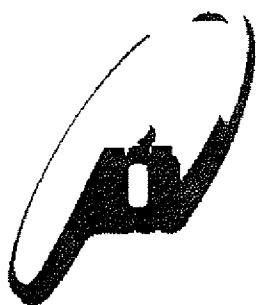
- Increased perception of safety
- Better pricing and acceptance in European markets
- FDA requires studies in pediatrics

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ABT-773 Pediatric Program Formulation Objectives

- Develop coated particle formulae for global use
 - coated particles for Suspension - 150mg/5mL & 300mg/5mL
 - coated particles as a dry syrup, sprinkle or sachet.
- Desired Properties
 - Once a Day Dosing
 - Acceptable 'Initial Taste'
 - Minimal 'After Taste'
 - No Unpleasant Mouth-feel
 - Acceptable Color and Flavor
 - No Refrigeration Required.



ABT 773 Pediatric Program

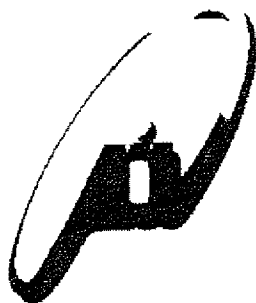
Taste Assessment

Sensory Analysis of Uncoated Drugs *Summary of Results*

The three drug substances can be ranked from most to least bitter as follows:

Drug Substance	Concentration (ppm) Which Exhibits an Initial Bitter Intensity <1 (Slight)
ABT-773	0.79
Clarithromycin	4.2
Azithromycin	15

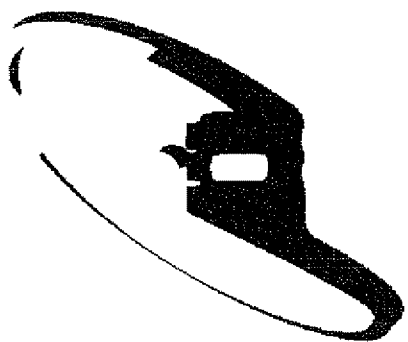
- ABT-773 is approximately five times more bitter than clarithromycin



ABT 773 Pediatric Program

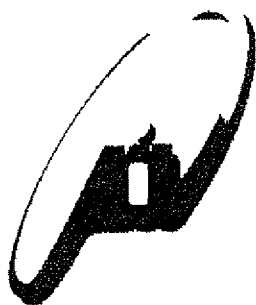
Taste Assessment

- The ABT-773 encapsulated prototype #2 may be at risk of dosing compliance problems due to flavor quality.
- Overall ABT-773 Prototype 2
 - Less bitter than Biaxin both initial and after taste
 - More bitter than Zithromax both initial and after taste
- For ABT-773 Prototype 2, the flavoring aromatics and sweetness decay quickly, exposing the bitterness which lingers throughout the aftertaste at or above the “concern” intensity level.



Japan Program

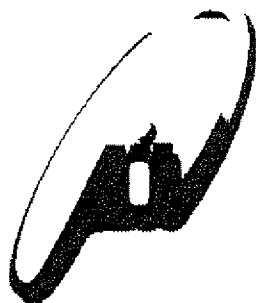
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Japan Program Taisho

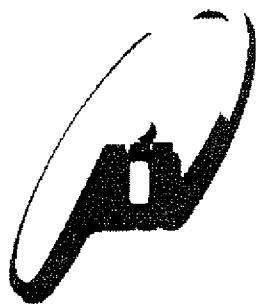
- Japan development is planned in coordination with Taisho and Dainabot
- Meetings are held at least 3 times a year to review developments
- Taisho funds 10.69% of global development costs and 50% of local Japan costs.
- Bridging strategy is primary plan for development in Japan

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Japan Program Clinical Plan

- Phase I in Japan
 - Food Effect Study Start
Completed
 - Single and multiple dose study Completed
 - Review data (Abbott/Taisho) April/01
 - PK data Japanese vs Caucasian
 - Development program strategy
 - Present Kiko data and recommend development program
May/01
 - Start Tissue Conc. Study 2Q/01



Japan Program Clinical Plan

- PK similar in Japanese and Caucasians (12/02 filing)
 - Recommend to Kiko same dose in Japan as in ex-Japan
 - Recommend to Kiko one comparative bridging study in CAP (Phase III) and several smaller local studies in skin infections, dentistry, otolaryngology, UTI and pan-bronchiolitis
 - Taisho agreement necessary prior to Kiko meeting
- PK different in Japanese and Caucasians (12/03 filing)
 - Phase II dose ranging study in CAP (Bridging study)
 - Phase III comparative study will be required
 - Full development time line
 - Implications on Taisho cost-sharing

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Pharmaceuticals Strategy Update September 2000

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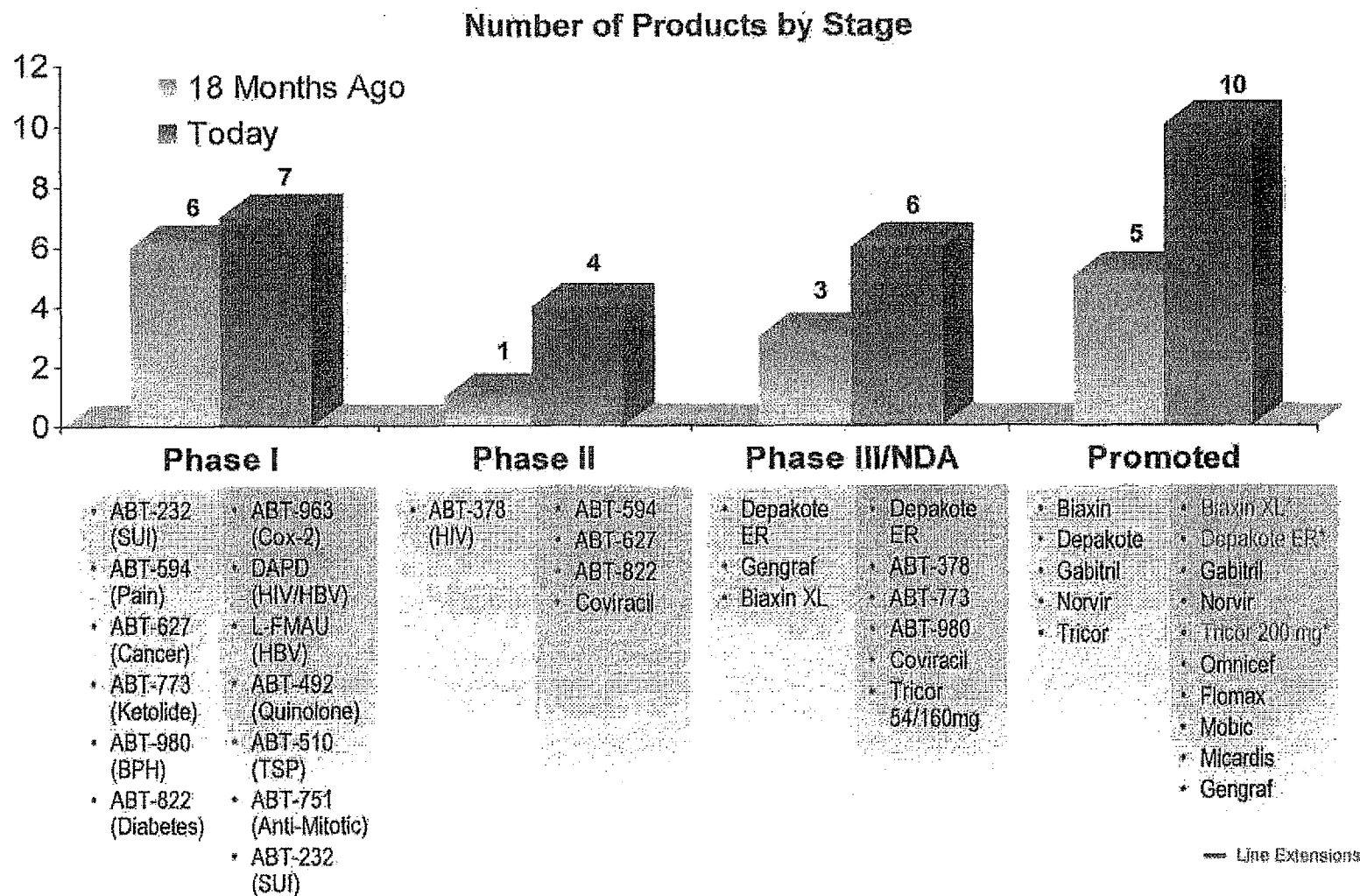
For the past 18 months, PPD has been implementing a four-point strategy designed to achieve and sustain double-digit sales growth

- Create stand-alone and P&L responsible businesses, or Franchises, which provide a focused platform for future new products, to improve critical mass in R&D and Marketing

- Re-engineer R&D operations and grow R&D dollars to increase the output of internally-developed new products and line extensions
- Fill the short-term sales gap by accessing new products through an aggressive in-licensing program; focusing on products which broaden existing Franchises
- To sustain long-term growth, pursue strategically attractive acquisitions, with particular focus on biotech and specialty manufacturers

This strategy was first presented to the Board at last year's June meeting in London

This strategy has focused on increasing the development pipeline through increased productivity programs, spending and external deals

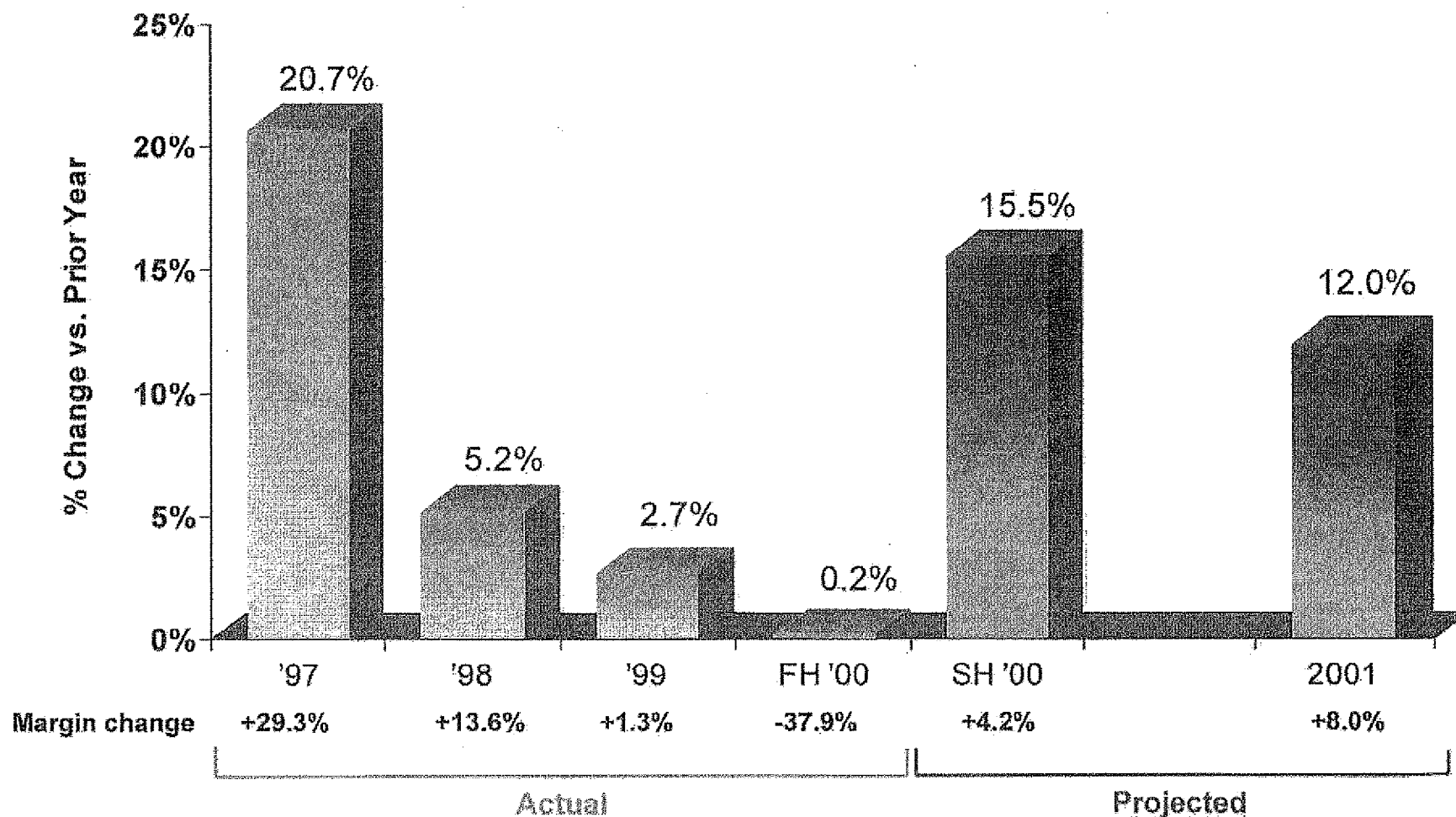


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KALETRA, Abbott's new Protease Inhibitor for the treatment of AIDS, is the most exciting of these new compounds

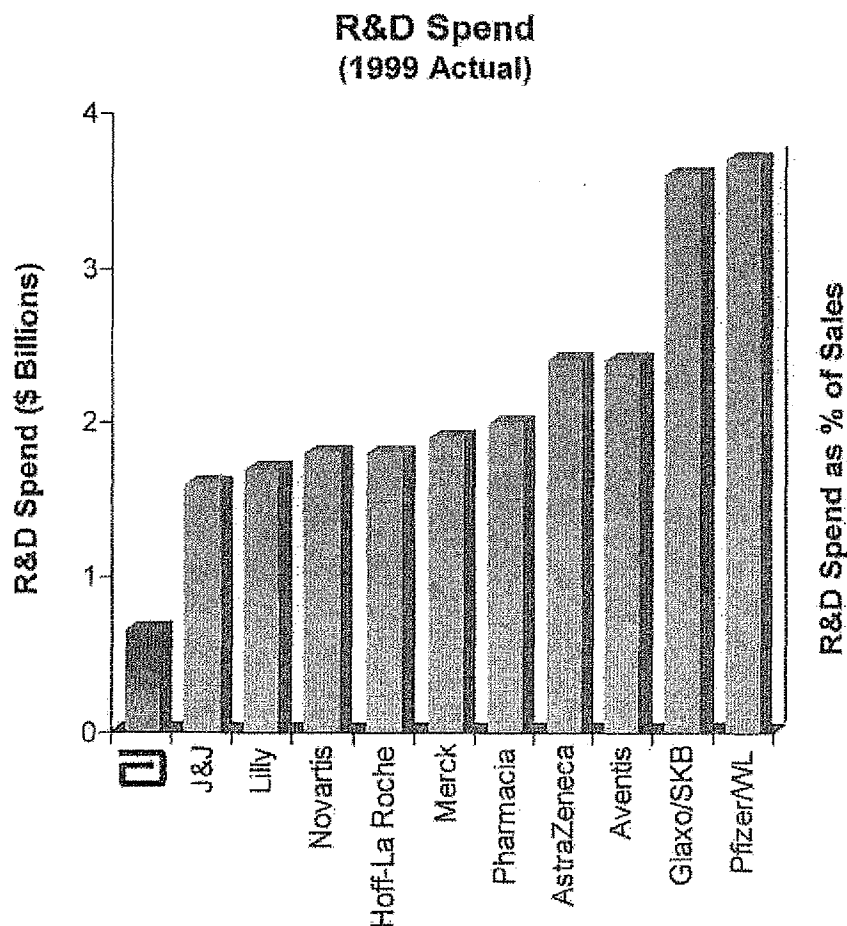
- The goal of the R&D team was to create a "best in class" protease inhibitor. This was achieved with superior efficacy results in place
- Development was accelerated resulting in 46 months from first-in-man to approval, over a year faster than the norm
- Expected approval in the U.S. in August 2000
- Peak year global sales are projected at \$600MM

These efforts will result in double-digit sales growth over the next 18 months, but margin growth will be dampened

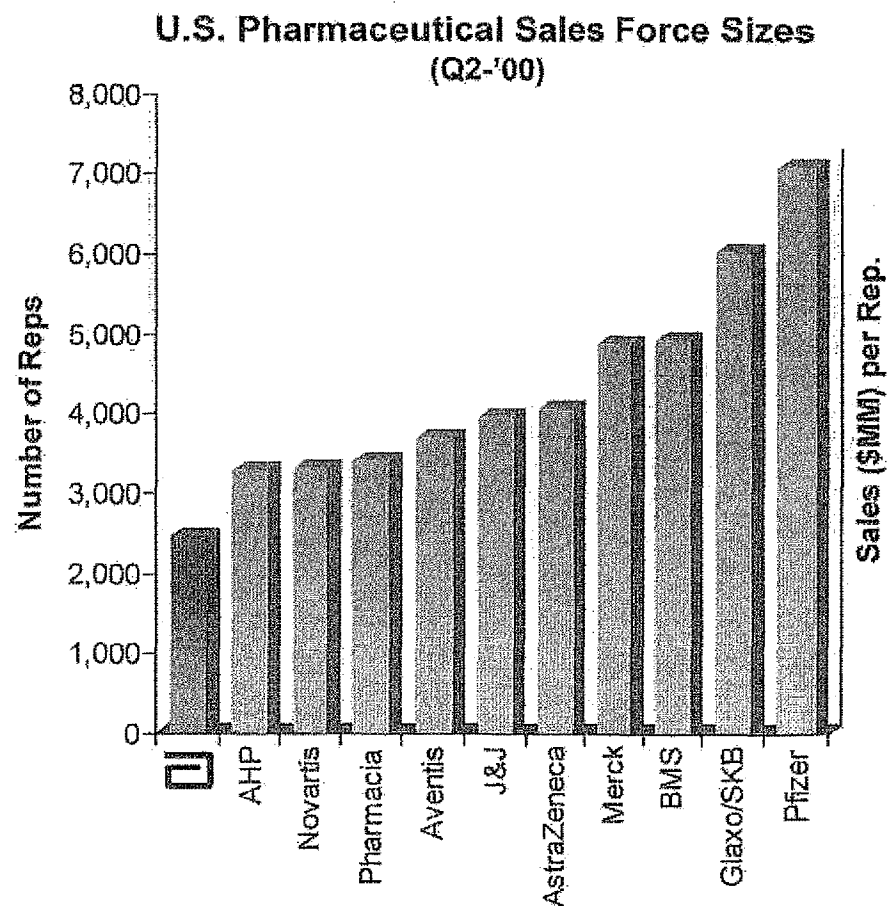


NOTE: Sales figures exclude Abbokinase

These gains were achieved even though Big Pharma continues to use R&D spend and promotional muscle as a barrier to entry. This has served to widen the gap between "big pharma" and the rest of the industry, putting further pressure on profit margins



Source: Wood Mackenzie



Source: Scott-Levin Salesforce Structures (Q2/00)

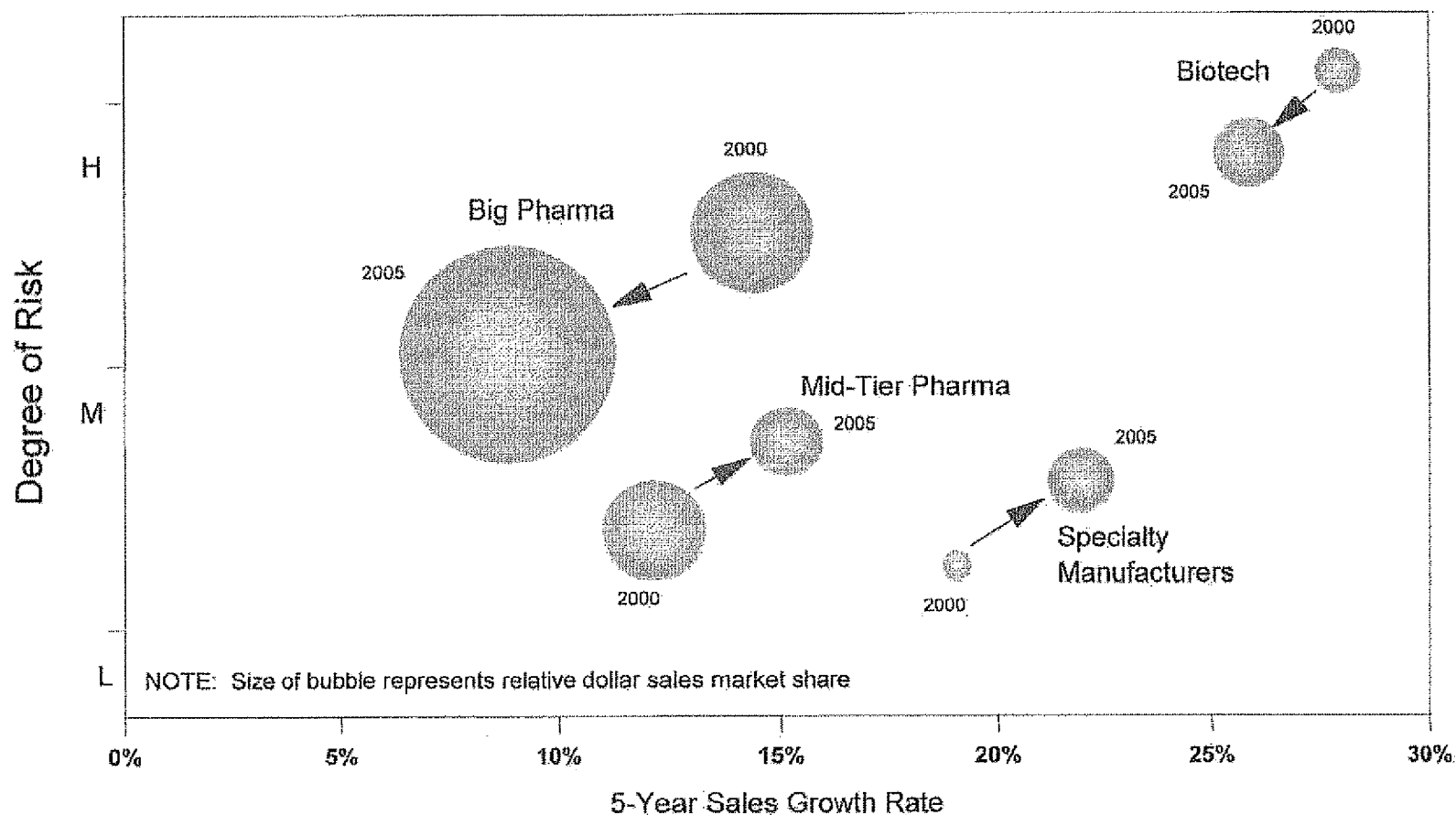
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Faced with the challenge of R&D and promotional critical mass, the market is separating into four groupings, or business models

- Big Pharma (Pfizer, Glaxo, SKB)
 - Strategy to acquire R&D/sales force critical mass. This has been the industry trend over the last few years. These “mega-companies” must be able to integrate different corporate cultures and introduce several significant NCEs each year to ensure sales growth of 10%+
- Mid-Tier Pharma (Abbott, Schering-Plough, Forest)
 - Strategy to achieve expertise and appropriate scale in specific therapeutic categories. To increase likelihood of success, Discovery is approached through combination of in-house development and in-licensing. Vulnerable to acquisition by larger companies
- Specialty Manufacturer (Alza, Elan, Sepracor)
 - Strategy reduces the product risk by developing improved forms of accepted products. This approach can also shorten time to market but profitability through royalty payments is reduced relative to NCE ownership
- Biotech (Amgen, Biogen)
 - Initially, strategy to partner commercialize assets, progress to narrowly focused, fully integrated companies

These four business models have varying degrees of risk and probability of future sales growth. However, success will be determined by excellence in both R&D and commercialization



There will be winners and losers in each segment. The losers will be acquired as the industry continues to consolidate

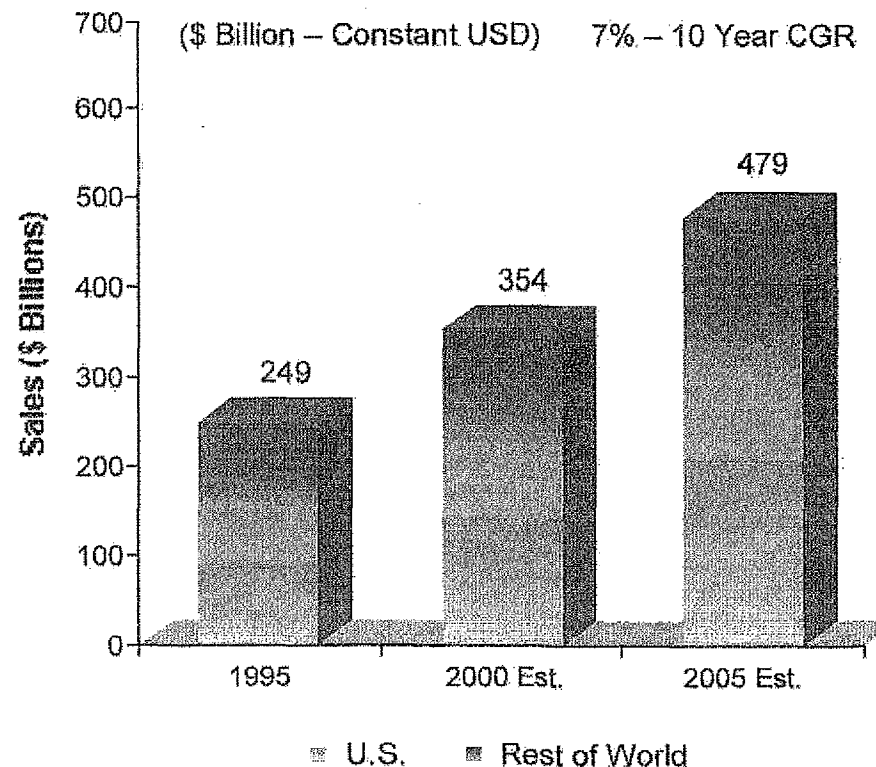
It makes sense to grow the Abbott pharma business from commercial and scientific perspectives

- The pharmaceutical industry is one of the world's largest and most profitable industries. Growth is expected to continue

- Global economic growth
- Aging population
- Acceptance of "lifestyle" drugs

- Recent advances in genomics and molecular genetics will greatly facilitate new drug discovery

Worldwide Pharma Sales
2000-2005 CAGR Growth Rates: U.S. +8%; ROW +5%



Source: IMS Health and Internal PPD Estimates

There will be both external and internal challenges to growing the Abbott pharma business

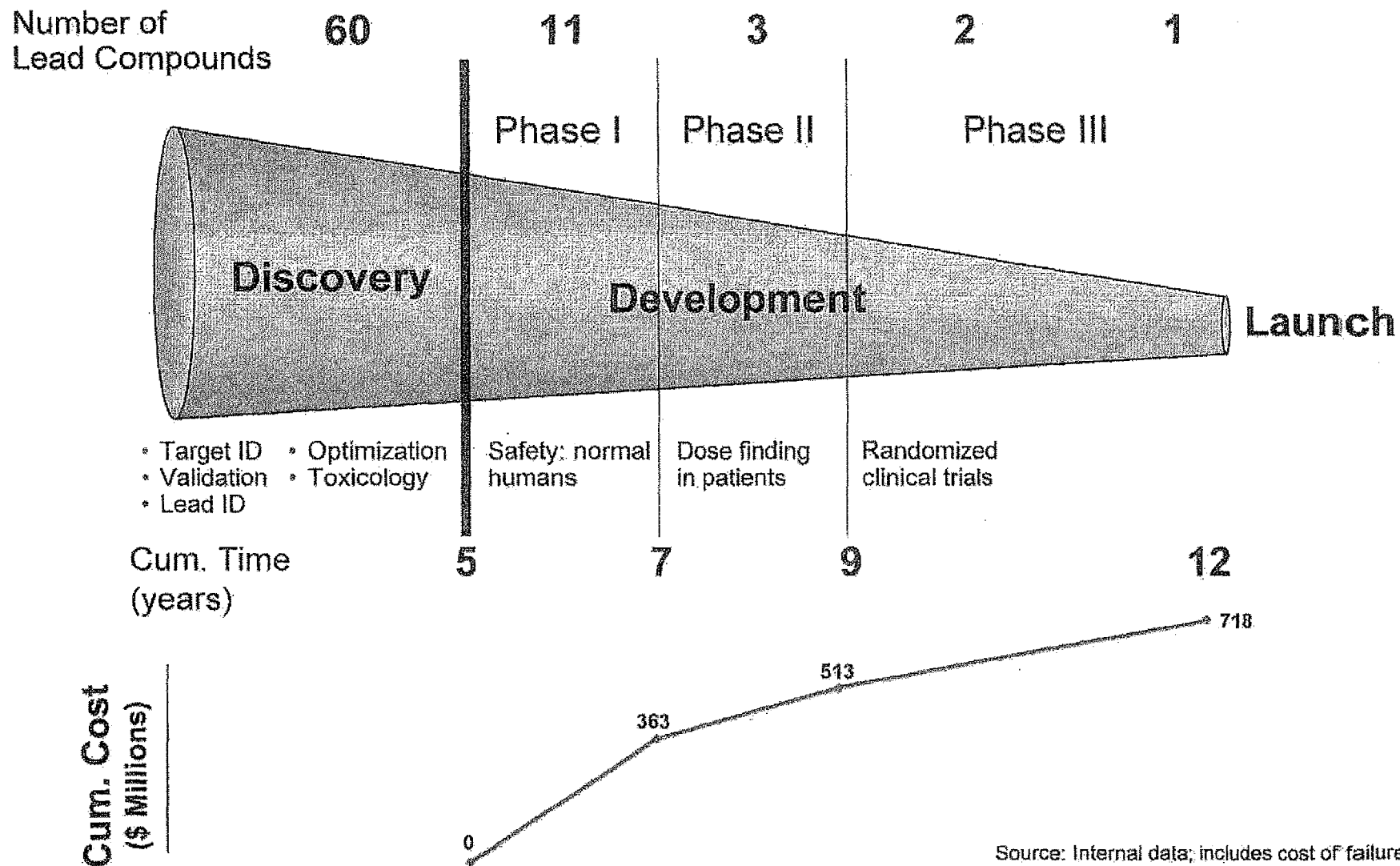
- External Challenges
 - Downward price pressure will continue.
 - Increasingly strict FDA scrutiny process resulting from product recalls (e.g., Rezulin, Propulsid, etc.) will lead to greater R&D costs as well as longer development timelines.
 - Increasingly rigorous regulatory and QA environment will add significant costs.

There will be both external and internal challenges to growing the Abbott pharma business

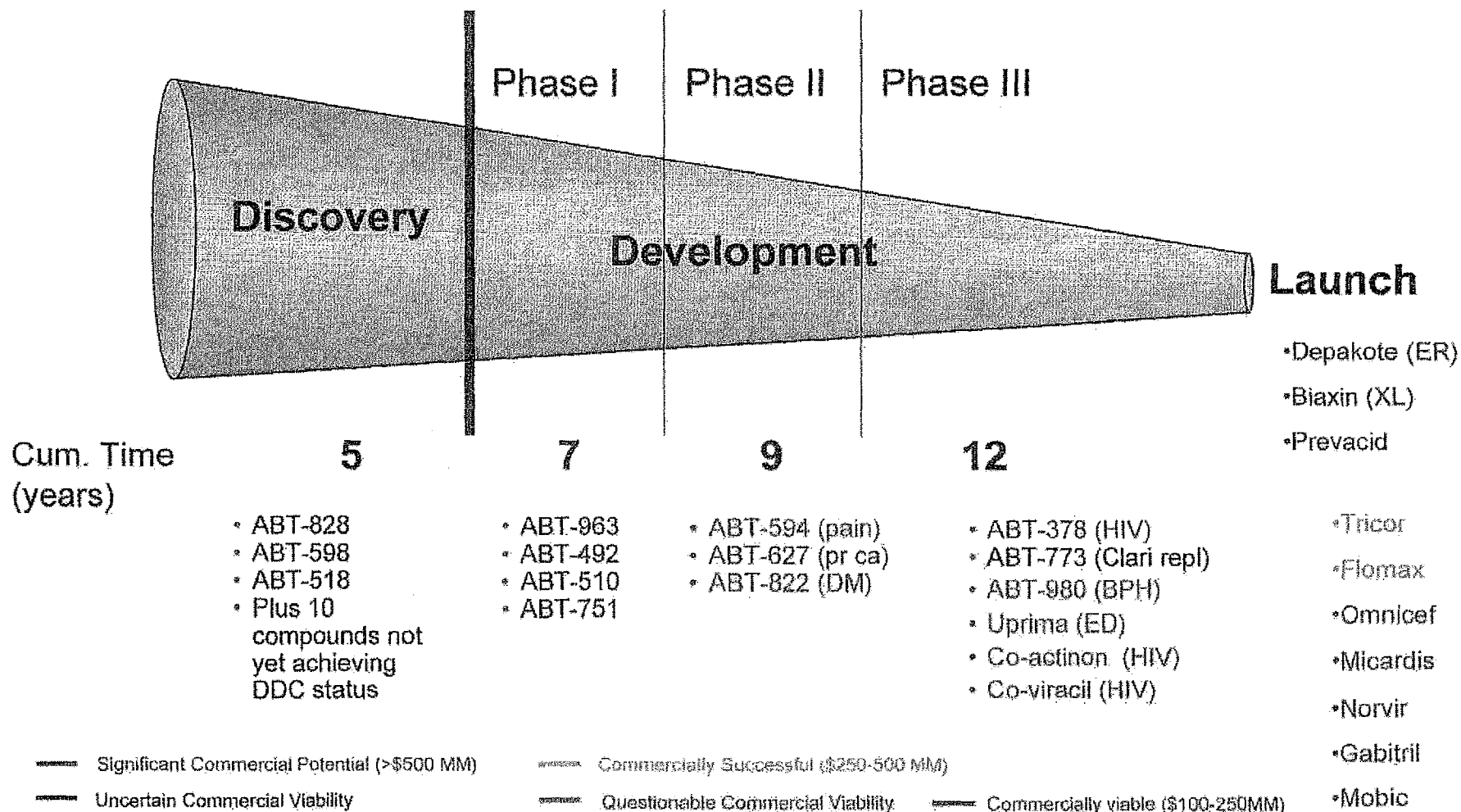
- Internal Challenges

- The imbalance of our pharma pipeline
 - many early stage compounds; not enough late-stage drugs
- Affordability
 - We cannot currently afford to develop all of our early stage compounds
- Fragmented pharma R and D effort
- Fragmented decision making processes for in licensing compounds

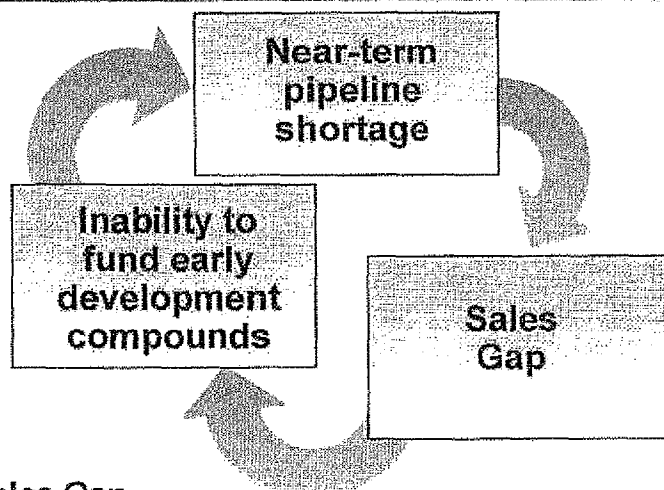
Drug development is a high risk business



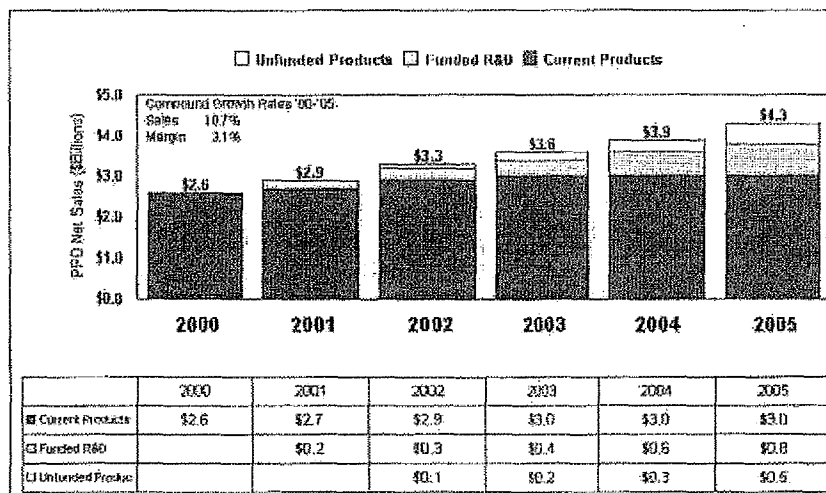
The Imbalance in the Abbott Pipeline



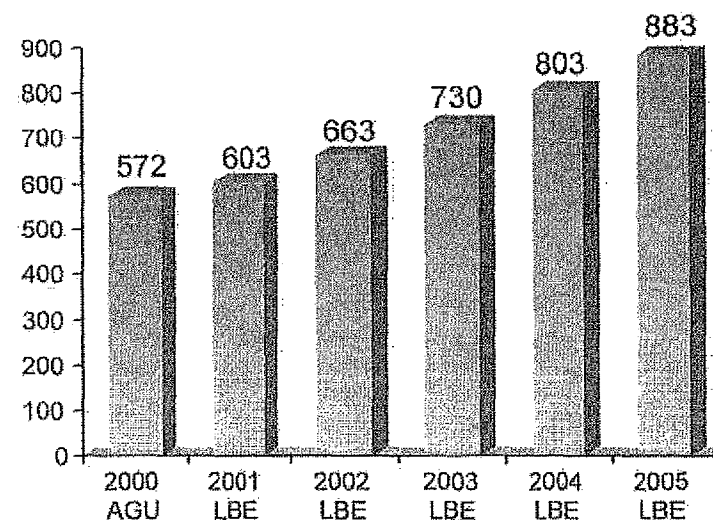
The Near-Term Pipeline Shortage Creates Sales and Funding Problems Over the LRP



Sales Gap

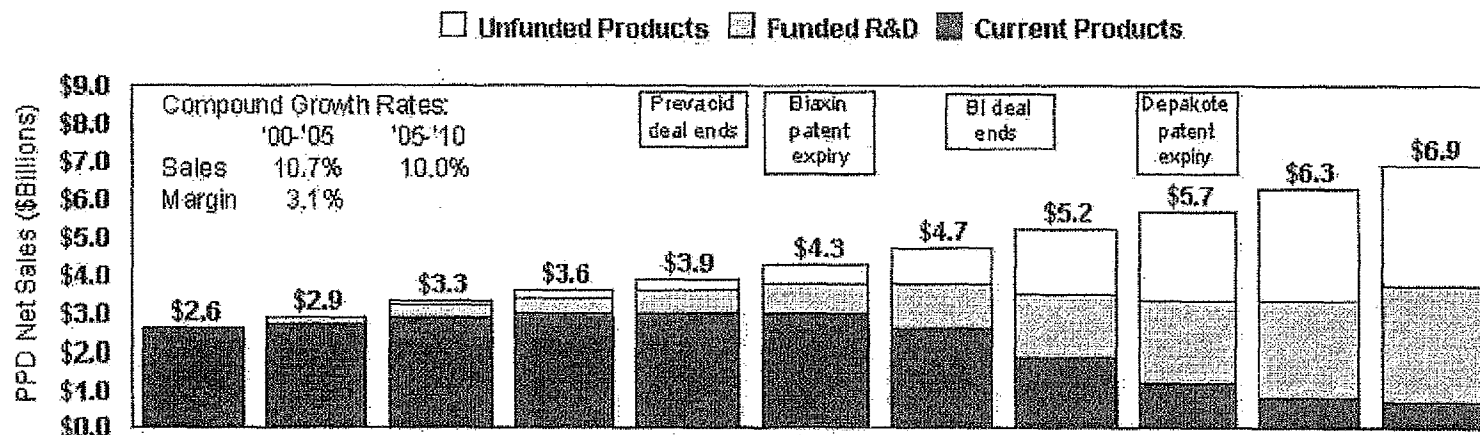


Global R&D Spending
5 Year CGR = 10%



- This rate of growth will fund the development of 11 new compounds over the LRP
- Abbott currently has 23 compounds that are in or will enter the development over the LRP

This near term lack of internally developed new products will create a larger sales and margin gap from 2005 on as patents expire for Biaxin (2005) and Depakote (2008) and deals for BI products (2006-07) and Prevacid (2004) end.



	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
■ Current I.	\$2.6	\$2.7	\$2.9	\$3.0	\$3.0	\$3.0	\$2.6	\$1.9	\$1.2	\$0.8	\$0.7
□ Funded		\$0.2	\$0.3	\$0.4	\$0.6	\$0.8	\$1.2	\$1.6	\$2.1	\$2.5	\$3.0
□ Unfunde			\$0.1	\$0.2	\$0.3	\$0.5	\$0.9	\$1.7	\$2.4	\$3.0	\$3.2

Abbott needs to launch nine new products (\$350MM peak year sales) in addition to those in the pipeline to assure double-digit compounded growth over the next 10 years.

These products, whether internally discovered or in-licensed are unfunded and would cost an estimated \$6 billion to develop over the next 10 years.

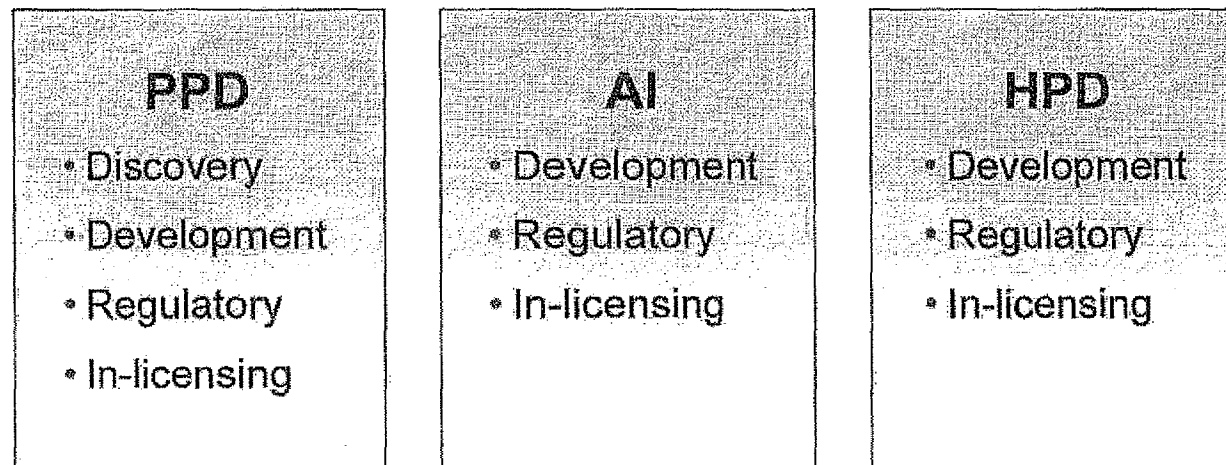
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Summary of Abbott Pipeline Challenges

- Short term challenges
 - Lack of late stage compounds creates a short-term sales gap over the LRP
 - Emphasis on in licensed compounds decreases margin to create an even larger margin gap over the LRP
- Long term challenges
 - We will lose margin from our three major products (bixain, depakote and prevacid) between 2004 and 2008.
 - There are not enough early stage compounds in the development pipeline to support the growth of the pharma business
 - We cannot currently afford to fund the development of the early compounds that we have

Abbott drug development is also impaired by fragmentation of the drug development and in-licensing efforts



This fragmentation:

- Produces redundant activity and spending
- Prevents efficient sharing of knowledge across the organization
- Prevents attainment of critical mass
- Makes it difficult to develop long-range global pharmaceutical strategy

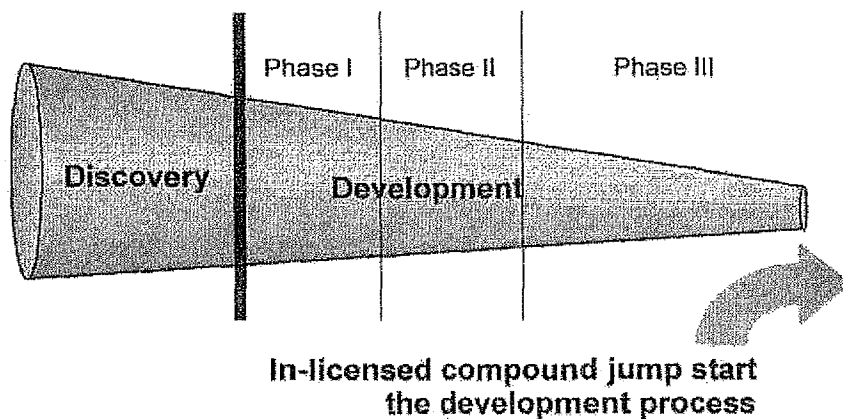
Possible strategies for addressing the challenges of growing the Abbott Pharma business

- Loading the pipeline with more late stage compounds
 - In licensing
 - Acquisition of small and mid cap biotechs
 - Co-marketing deals with other pharma companies
- Increase R and D spending to develop more early stage compounds
 - Creative deals for outside funding
 - John Hancock (\$200 MM over 4 years for R and D in exchange for a royalty on developed drugs)
 - Acquisition of companies with R and D spending
 - Alliances with biotech companies that are willing to co-fund development
 - Abbott is currently pursuing such a deal with Millennium in the areas of diabetes and obesity
 - Utilize genomics and other technology advances to increase the efficiency of the R and D process

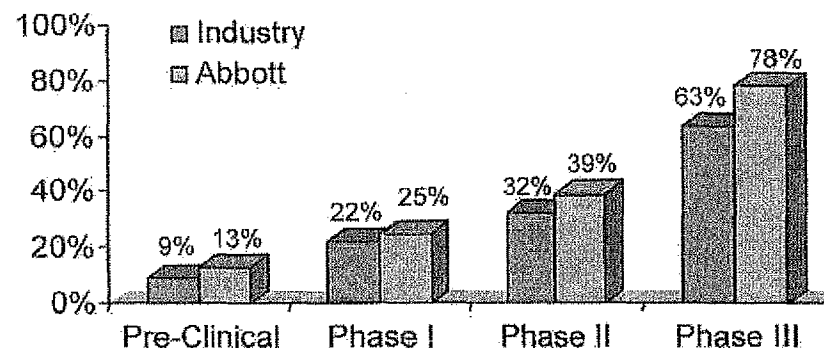
Possible strategies for addressing the challenges of growing the Abbott Pharma business (continued)

- Address fragmented R and D and in-licensing processes
 - Create integrated pharma R and D and in-licensing structures that are responsible for all drug development and in-licensing for PPD, AI, and HDP

It is becoming increasingly difficult to fill the pipeline through in-licensing and acquisitions.



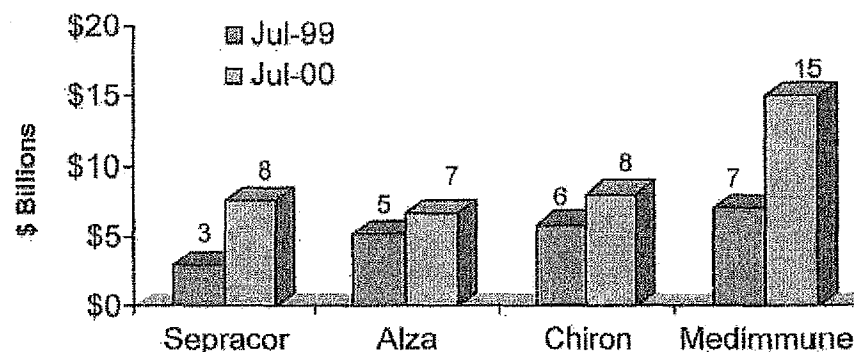
Probability of Product Launch



Sources: Lehman Bros., Internal Data

- Risk
 - Problems with Coactinon, FTC and Mobic highlight the risks of in-licensing
- Expense of product deals
 - Buying frenzy for late-stage products has challenged conventional valuation models
- Tactical acquisitions becoming less affordable
 - Soaring market capitalization of smaller pharma and biotech companies

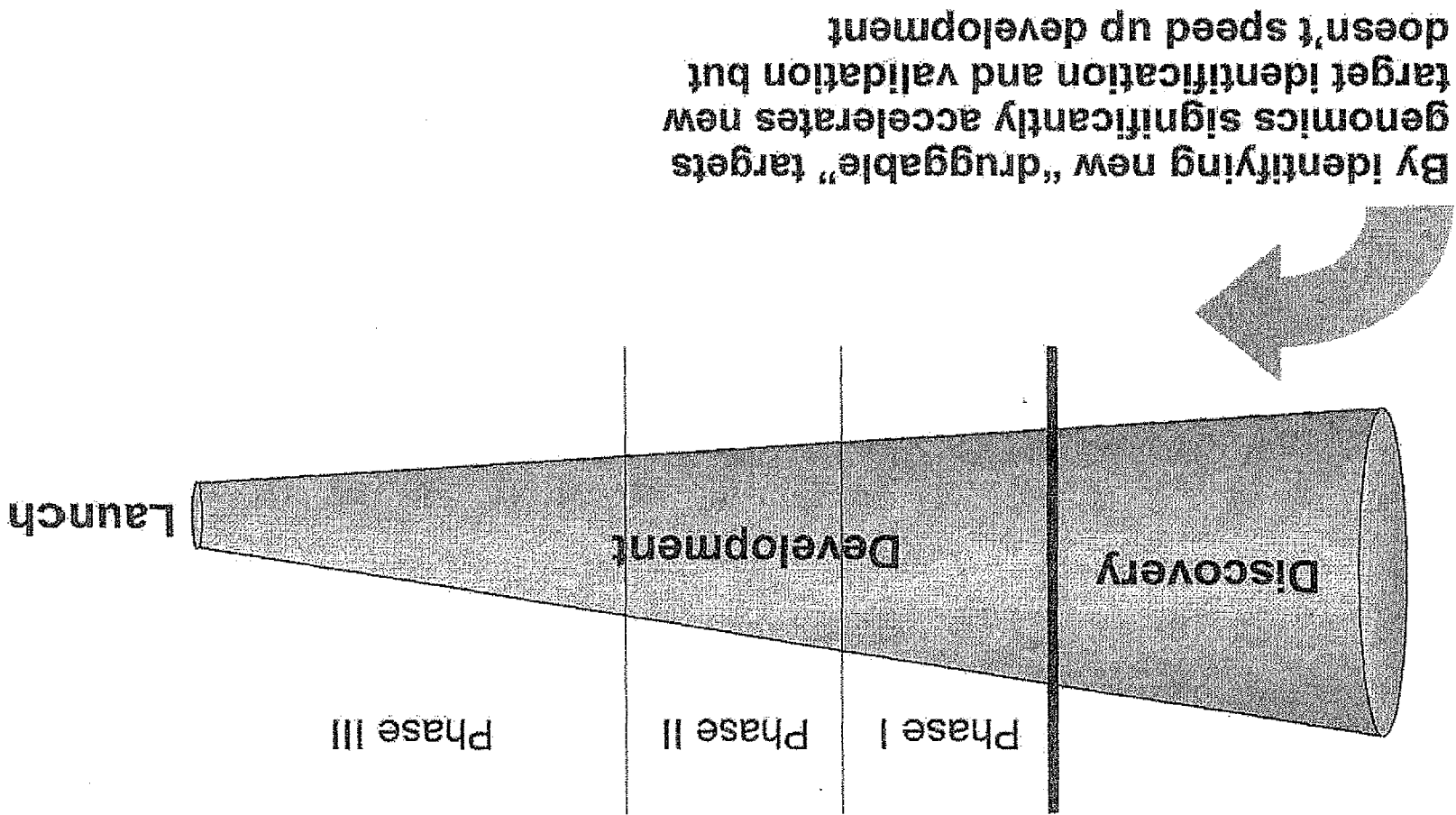
Market Capitalization



Source: Stock Market Data

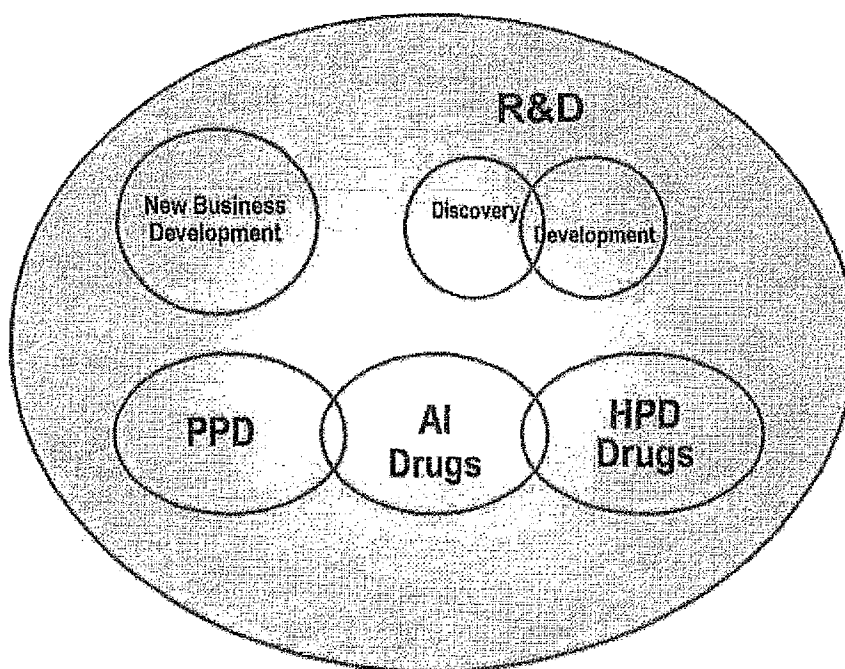
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Genomics is an important part of the long-term strategy but will not help fill the pipeline near-term

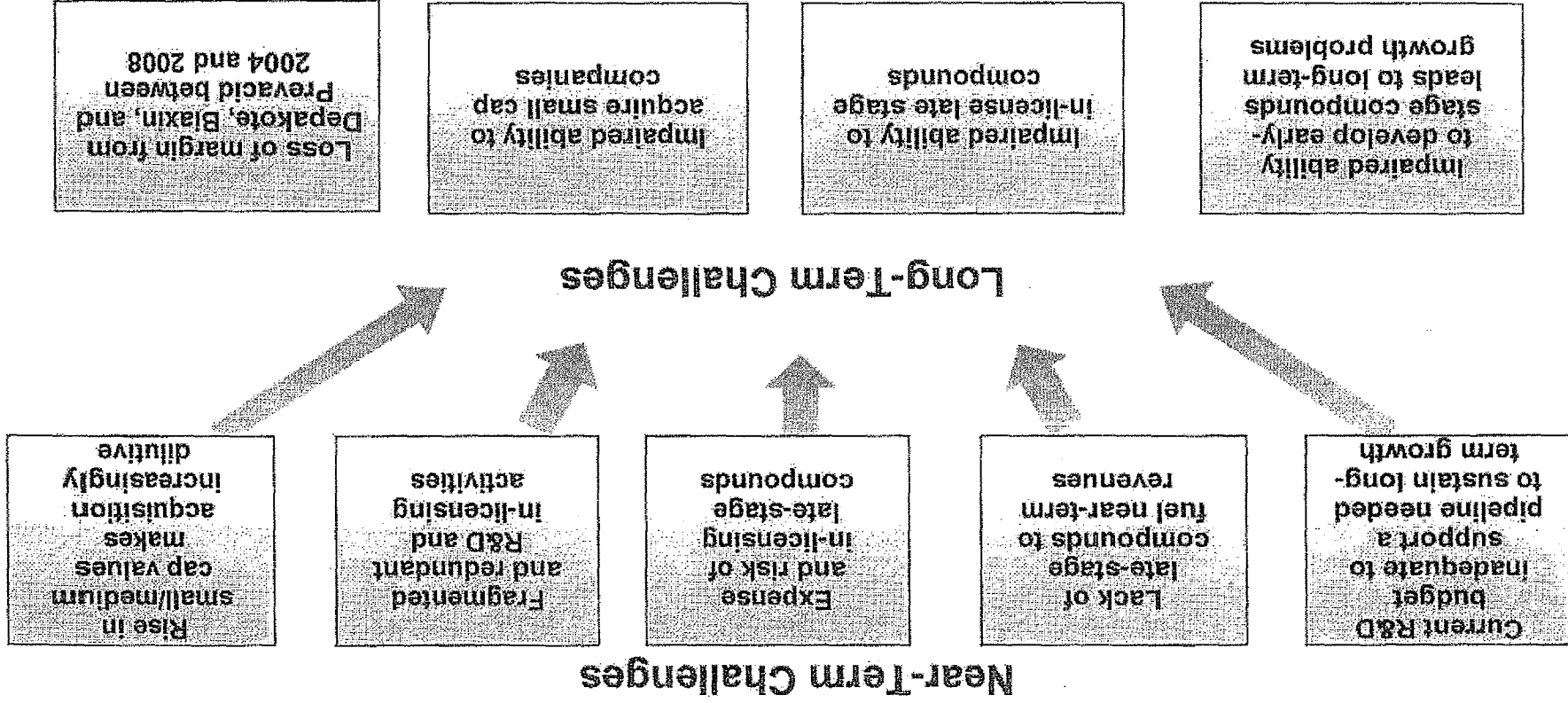
Abbott is considering integrating pharma R and D and new business development in order to address this fragmentation



Advantages

- Integrates all pharma R&D into a single unit leading to
 - economies of scale,
 - a portfolio approach to decision making and global product development
- Creates a single new business development unit to pursue global Pharma deals

Abbott faces a matrix of challenges in growing its pharma business



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Conclusions:

- Improved in-licensing, R and D, and small deals for late stage compounds can be used to fill the sales gap in the LRP through 2005. However such approaches will limit margin growth over the LRP
 - These traditional approaches will be insufficient to maintain sales or margins in the face of losing Depakote, biaxin, and prevacid revenues between 2004 and 2008.
- This analysis suggests that a larger acquisition or merger will be necessary to successfully grow the pharma business over the next 10 years.

TAB C

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
1	B	Matrix Metalloproteinase Inhibitors Project - Discovery Development Candidate Meeting	HEAR AUTH OPIN
2	C	2001 Plan Assumption Memo	HEAR AUTH
3	G	Oncology Portfolio Analysis Inputs - Project List, Product Profiles and Probabilities of Technical Success - Draft for Team Review, November 8, 2000	AUTH HEAR
4	H	MMPI Working Group Meeting, Meeting Objective: ABT-518 Program Update	AUTH HEAR
5	J	ABT-518 Descriptive Memorandum, February 2001	HEAR AUTH
6	N	MMPI Monthly Meeting Agenda	AUTH HEAR
7	R	Email from Philip M. Deemer to sblewitt@jhancock.com@internet re MMPI Program Update	AUTH HEAR
8	S	Email from Diane L. D'Amico to jhm@nki.nl re M00-235 Update	AUTH HEAR
9	T	Email from Diane L. D'Amico to jhm@nki.nl re M00-235 Update	AUTH HEAR
10	U	Email from Jim Looman to Azmi A. Nabulsi et al. re NKI Study	AUTH HEAR
11	V	Email from Paige Gjelsten to Jim Looman et al. re M00-235 Study Hold Lifted	HEAR
12	W	Email from Diane L. D'Amico to l.v.beerepoot@azu.nl re M00-235: Validated PD Methods	AUTH HEAR
13	X	Email from Diane L. D'Amico to Azmi A. Nabulsi re Erroneous Dosing of Patient	HEAR
14	Y	Email from Philip M. Deemer to Joyce L. Devault re For Overhead	HEAR AUTH
15	Z	Email from Jim Looman to Diane L. D'Amico re M00-235 Update	AUTH HEAR
16	AA	Email from Diane L. D'Amico to Willy Jansen et al. re M00-235 Update	HEAR AUTH
17	AB	E-mail from Deemer to Nisen	AUTH HEAR
18	AC	Email from Jim Looman to Diane L. D'Amico re Restart 518 Study	AUTH HEAR
19	AD	Email from Perry D. Nisen to Philip M. Deemer re Hancock and Alcon	AUTH HEAR
20	AE	Email from Paige Gjelsten to MMPI Team re MMPI Working Group Meeting Minutes: 3/8/01	AUTH HEAR
21	AF	Email from Philip M. Deemer to Perry D. Nisen re Hancock and Alcon	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
22	AG	E-mail from Perry D. Nisen to Azmi A. Nabulsi re: DMC Project Review Meetings	AUTH HEAR
23	AJ	Email from Tamara L. Garavalia to Michaela L. James et al. re: ABT518	AUTH HEAR
24	AL	Email from Perry D. Nisen to Azmi A. Nabulsi re: MMPI	HEAR
25	AM	E-mail from Nisen to Leonard with ASCO slides	HEAR
26	AN	Email from Perry D. Nisen to John M. Leonard re: ABT-518	AUTH HEAR INC
27	AO	Email from Diane L. D'Amico to Diane C. Bronson et al. re: ABT-518 Tox	AUTH HEAR
28	AP	Email from Diane L. D'Amico to Lise I. Loberg re: ABT-518 Tox	AUTH HEAR
29	AQ	Email from Diane C. Bronson to Diane L. D'Amico re: ABT-518 Tox	AUTH HEAR
30	AR	Email from Diane C. Bronson to Lise I. Loberg re: ABT-518 Tox	AUTH HEAR
31	AS	Email from Lise I. Loberg to William M. Bracken et al. re: resume ABT-518 activities: FALSE ALARM!	AUTH HEAR
32	AU	Email from 8776893456@skytel.com to Diane L. D'Amico re: MMPI	AUTH HEAR
33	AV	Email from Thomas J. Lyons to Kenneth D. Stiles re: MMPI Phase I Study Options	AUTH HEAR
34	AW	Email from Lise I. Loberg to William M. Bracken et al. re: ABT-518 update	AUTH HEAR
35	BA	Email from Diane C. Bronson to Paige Gjelsten re: MMPI Meeting Minutes from 6/7/01	AUTH HEAR
36	BC	Email from Philip Deemer to Dan Norbeck re MMPI	HEAR AUTH
37	BD	Letter to Perry Nisen from Steven K. Davidsen, Ph.D. re: ABT-518	HEAR
38	BE	Memo from Perry Nisen to Dan Norbeck et al. re: ABT-518	HEAR
39	BF	Email from Phillip M. Deemer to Bruceb@amgen.com@internet re: Licensing Opportunities	HEAR
40	BH	Email from Jane A. Hoff-Smith to Suzanne Lebold et al. regarding Update on ABT-518	HEAR AUTH
41	BJ	Proposed Program Rationalization	AUTH HEAR INC
42	BK	Letter from Azmi to Jim re project review with upper management on Wednesday	HEAR AUTH
43	BN	MMPI A-291518 Discovery Development Candidate Approval Slide	INC AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
44	BO	Email from Perry Nisen to Philip Deemer re Hancock and Alcon	HEAR
45	BP	Email from Aldona T. Matalonis to hg@clinphone.com@internet re Suspend Work on Abbott M99-115 IVR Project	HEAR AUTH IRREL
46	BR	Memo to Leonard re Meeting Minutes for Analgesia Venture Portfolio Review	HEAR AUTH
47	BS	Email from Kacos to Boyd re Analgesia Portfolio Review, with slides	HEAR AUTH
48	BT	Letter from McCarthy to Meyer enclosing documents for ABT-594 European Advisory Meeting	AUTH HEAR
49	BW	Email from Gary D Jones to Tamara L Garavalia re meeting	HEAR
50	BX	Email from Aldona T Matalonis to Catherine K Kacos re 3 page summary sheet for ALZA	HEAR AUTH
51	BY	Email from James W Thomas to Fred W. Siebert et al re 114 Sample Size	AUTH HEAR
52	BZ	Email from Christopher J Silber to Grace C Dunn et al. re Analgesia Venture Monthly Highlights	HEAR AUTH
53	CC	ABT-594 Descriptive Memorandum	AUTH HEAR
54	CD	Email from Marilyn J Collicott attaching site breakdown/enrollment for M99-114	HEAR AUTH
55	CF	Email from Marilyn Collicott to Bruce McCarthy re Updates fro M99-114 Phase IIb Meeting	AUTH HEAR
56	CH	Email from Tamara L Garavalia to Aldona T Matalonis et al. re M99-114 300 mcg dose group	AUTH HEAR
57	CI	Email from Steve Blewitt to Steve Cohen re Questions	AUTH HEAR
58	CJ	Email from Bruce McCarthy to David D Morris et al. re M99-114 Protocol Change Discussion	HEAR
59	CK	Email from Michael Biarnesen to Aldona Matalonis re RQA Auditor Assignment for Analgesia Venture	AUTH HEAR
60	CO	Email from Laura Robinson to Andrea Landsberg re RE: ABT-594 Commercial Section w/Laura Robinson Input	AUTH HEAR
61	CP	Email from James W Thomas to Bruce McCarthy re 114 fax ae numbers	HEAR AUTH
62	CQ	Email from James Thomas to Catherine Kacos re M99-114 graph data	AUTH HEAR
63	CR	Email from Marilyn J Collicott to Christopher J Silber re M99-114 Extension letter	HEAR AUTH
64	CS	Letter from Marilyn Collicott re Protocol M99-114: A Randomized, Double-Blind, Placebo-Controlled Comparison of the Safety and Efficacy of ABT-594 to Placebo in Subjects with Painful Diabetic Neuropathy	HEAR AUTH

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
65	CV	Email from Christopher J Silber to Catherine K Kacos re Trip Report: Visit to Gibson, Biton, Kipnes, Hewitt	AUTH HEAR
66	CW	Randomized, Double-Blind, Placebo Controlled Evaluation of the Safety and Efficacy of ABT-594 in Subjects with Painful Diabetic Polyneuropathy; The 594/M99-114 Study, Centralized Patient Recruitment Program	HEAR AUTH
67	CX	Email from Andrea Landsberg to Christopher J Silber re Purdue CDA	AUTH HEAR
68	CY	Email from James W. Thomas to Rebecca L. Brown re ABT-594 M99-114 Slides for David with attached notes	AUTH HEAR
69	DA	Email from Christopher J Silber to John M. Leonard re 594 Neuropathic pain study	HEAR OPIN
70	DC	Email from Andrea Landsberg to Robert J Weiland re ABT 594/963 Purdue meeting	HEAR AUTH
71	DD	Email from Marilyn J Collicott to Susan E Nunn et al. re M99-114	HEAR AUTH
72	DE	Email from Mike Williams to Jennifer Smoter re Re: NNR documents	HEAR AUTH
73	DF	Email from Christopher J Silber to Nancy M Palbicke re Attached question list	AUTH HEAR
74	DG	Email from Andrea Landsberg to Christopher J Silber et al. re 594 Leiden presentation	AUTH HEAR
75	DI	Email from Robert J Weiland to Christopher J Silber re Re: Pharmacia meeting	AUTH HEAR
76	DK	Email from Bruce McCarthy to Christopher J Silber re Re: Pharmacia meeting	AUTH HEAR
77	DL	ABT-594 Descriptive Memorandum dated November 2000	AUTH
78	DM	Email from James Sullivan to Robert J. Weiland re Re: Pharmacia meeting	AUTH HEAR
79	DN	Email from Bruce McCarthy to Robert J Weiland et al. re ABT-594 Partnership Strategy Meeting	AUTH HEAR
80	DO	Email from Linda Orovitz to Chris Speh, et al re Info for Abbott mtg	HEAR AUTH
81	DQ	Draft Project Review: ABT 594 Agenda	INC AUTH HEAR
82	DR	Email from Bruce McCarthy to David D Morris et al. re ABT-594 M99-114 Study Size Discussion	AUTH HEAR
83	DS	Email from Michael K Biarnesen to Andrea Landsberg re Re: ABT 594 forecast scenarios for BD partnering	AUTH HEAR
84	DT	Email from Elizabeth Kowaluk to Bryan F Cox re Re: 12/6 meeting	AUTH HEAR
85	DV	Email from Marilyn J Collicott to Michael K Biarnesen re Re: November Monthly Project Status Report, ABT-594	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
86	DW	Chart and Notes re Abbott M99-114	AUTH HEAR IRREL OPIN
87	DX	Email from Marilyn J Collicott to Marian L Borgstrom et al. re Study M99-114	AUTH HEAR
88	DY	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	AUTH HEAR IRREL
89	DZ	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	AUTH HEAR
90	EA	Email from Bruce McCarthy to Christopher J Silber re landsberg email	AUTH HEAR
91	EB	Email from Jennifer Dart to Christopher J Silber et al. re Analgesia Internal Review Notes	AUTH HEAR
92	EC	Email from Bruce McCarthy to Christopher J Silber re Purdue presentation	AUTH HEAR
93	EE	Email from Bruce McCarthy to Christopher J Silber et al. re AEs for preterms - blinded look	AUTH HEAR
94	EF	ABT-594 Titration Optimization Initial Brainstorm Discussion, Agenda, January 23, 2001	AUTH HEAR
95	EG	Email from Jennifer Dart to Prioritization Meeting Attendees re APU Prioritization Meeting	AUTH HEAR
96	EH	Email from Christopher J Silber to James Sullivan re ABT-594	AUTH HEAR
97	EJ	Email from Michael K Biarnesen to Christopher J Silber et al. re Re: financial slides for Leiden meeting 2/2	AUTH HEAR
98	EK	ABT-594 Descriptive Memorandum, February 2001	AUTH
99	EM	Draft Project Review: ABT 594, Agenda	AUTH HEAR
100	EN	Email from Bruce McCarthy to Elizabeth Kowaluk re DSG	AUTH HEAR
101	EO	Email from Bruce McCarthy to Michael K Biarnesen et al. re Re: Consideration of IV work with ABT-594	AUTH HEAR
102	EP	Email from Bruce McCarthy to Chris Silber et al. re Scientific Strategy for ABT-594/NNR Tolerability	AUTH HEAR
103	EQ	Email from Bruce McCarthy to Marleen Verlinden re ABT-594 Guest Speaker and Discussion	AUTH HEAR
104	ER	Email from Marleen H Verlinden to Christopher J Silber re Re: ABT-594 partnering	AUTH HEAR
105	ES	Email from Marilyn J Collicott to stherriault@rsi-nc.com enclosing M99-114 Investigation List and Early Terminations	HEAR AUTH
106	ET	Email from Bruce McCarthy to pandrews@sghms.ac.uk re Re: abbott visit	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
107	EU	E-mail from Marleen Verlinden re: Dr. Andrews	AUTH HEAR
108	FA	E-mail from Bruce McCarthy re: Dr. Andrews meeting	HEAR AUTH
109	FB	Email from Bruce McCarthy to Elizabeth Kowaluk re Re: Draft Decision Frame for ABT-594/Pain Strategy DSG	AUTH HEAR
110	FD	Email from Elizabeth Kowaluk to Marleen H Verlinden et al. re ABT-594/Pain Strategy DSG - 3/5 Meeting Minutes	AUTH HEAR
111	FE	Email from Paul Andrews to Bruce McCarthy re answers	HEAR AUTH
112	FH	Email from Michael Williams to Jeff Leiden re List of next steps from portfolio review	HEAR AUTH
113	FI	Confidential R&D Integration Update Discussion Document	HEAR AUTH
114	FJ	Email from Susan E Nunn to Judith S Brownell re update regarding M99-114	AUTH HEAR IRREL
115	FL	Confidential Overview of Abbott R&D Fact Pack - April 2001	HEAR AUTH
116	FM	Email from Elizabeth Kowaluk to Keith F Hendricks et al. re Pharma Strategy Retreat on May 2-4	HEAR AUTH
117	FO	E-mail from Jeff Drajesk with GPRD attachment	INC AUTH HEAR
118	FQ	Email from Michael D Meyer to James Sullivan re ABT-594 Memo	AUTH HEAR
119	FR	Resource Allocation Across GPRD, Discussion Document	HEAR AUTH
120	FS	Email from Jessica Hopfield to Jeff Leiden re R&D Strategy Retreat Output	HEAR AUTH
121	FT	Email from James W Thomas to Yiming Zhang re 594	HEAR AUTH OPIN
122	FU	Email from Thomas E Woidat to Micahel K Biarnesen re Re: ABT-594 2001 Transition Budget; ABT-594 Transition Proposal	AUTH HEAR
123	FV	Email from Judith S Brownell to Marilyn J Collicott et al. re RELEASE OF DATABASE, M99-114 (MC114A), ABT-594	AUTH HEAR
124	FW	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets - June 18-20, 2001	HEAR
125	FY	Email from Elizabeth Kowaluk to Steve C Kuemmerle re ABT-594 DSG analysis - preview meetings	HEAR AUTH

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
126	GB	Email from Elizabeth Kowaluk to Bruce McCarthy	AUTH HEAR IRREL
127	GH	Email from Marilyn J Collicott to JanLips710@aol.com re Re: (no subject)	AUTH HEAR
128	GI	Email from Tamara L Garavalia to Linda M Fisher re ABT-594 Not Funded	AUTH HEAR
129	GJ	DSG Highlights: October 2001	AUTH HEAR
130	GK	Email from Philip M Deemer to Ake L Johansson re Update	AUTH HEAR
131	GL	Letter from Daphne Pals to Mr. Steve Blewitt re Research Funding Agreement dated as of March 13, 2001 Termination of ABT-594	AUTH HEAR
132	GM	Email from Michael D Meyer to Christopher J Silber re DDC slides	AUTH HEAR
133	GS	Letter to M99-114 study cites	HEAR AUTH
134	HA	E-mail string from Bruce McCarthy	AUTH HEAR IRREL
135	HB	Email from Michael Biarnesen to Christopher Silber re 594 sales/cost estimate slide	AUTH HEAR
136	HD	Email from Marilyn Collicott to stherriault@rsi-nc.com	AUTH HEAR
137	HH	Email from Bruce McCarthy to Michael Biarnesen re ABT-594 Update	AUTH HEAR
138	HJ	Letter from Marilyn Collicott to Michael Hoffstetter	AUTH HEAR
139	HK	Email from Christopher to Rosemarie Waleska re Advice	AUTH HEAR
140	HM	Email from Philip M. Deemer to Bruce McCarthy re: ABT-594 Call	AUTH HEAR
141	HO	Email from Bruce McCarthy to Michael Biarnesen	AUTH HEAR
142	HV	Email from Tim Vanbiesen to Elizabeth Kowaluk re ABT-773 Dosing Strategy Kick-off Meeting	HEAR AUTH OPIN
143	HX	ABT-773 Descriptive Memorandum dated May 2000	AUTH
144	HZ	Email from Gregor Bosco to Carol S. Meyer re ABT-773 Dev. Plan	HEAR AUTH
145	IA	ABT-773 Descriptive Memorandum	HEAR
146	IC	Email from Belinda Hightower to Phyllis Kincaid re Clinical Hold	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
147	ID	Email from Jeanne M. Fox to John M. Leonard et al. re FDA Telephone Contact Report ABT-773	HEAR
148	IF	Email from Jeanne M. Fox to Lawrence E. Roebel et al. re Executive Summary of ABT-773 End-of-Phase 2 Mtg w/FDA	AUTH HEAR
149	IG	Email from Jeanne M. Fox to Rod M. Mittag et al. re Slides for 12/5 Meeting	HEAR AUTH
150	IQ	Email from Jeanne M. Fox to James Steck re Studies to Meet Pediatric Rule Requirements	AUTH HEAR
151	IR	Email from Eugene X. Sun to Stan Bukofzer re 773 Material	HEAR AUTH
152	IV	Email from Thomas E. Woidat to William A. Brown re 773 Presentation	AUTH HEAR
153	IW	Email from Marleen H. Verlinden to Eugene X. Sun re ABT-773	AUTH HEAR
154	IZ	Email from Thomas E. Woidat to Jennifer Dart re: Portfolio Analysis - Update with APU budgets	AUTH HEAR
155	JA	Memo from Jeff Leiden to Stan Bukofzer, John Leonard and Eugene Sun re: First Call Report	AUTH HEAR
156	JB	Email to Hendricks, et al. re: Final copy of 773 decision analysis planned presentation	AUTH HEAR INC
157	JC	Email from Carol S. Meyer to Ake L. Johansson, et al. re: ABT 773 Taisho/Abbott Meeting - June 26th	AUTH HEAR
158	JD	Email from Stan Bukofzer to Jeanne M. Fox re: Final copy of 773 decision analysis planned presentation	HEAR
159	JG	Email from Carol S. Meyer to Stan Bukofzer re: ABT 773 2002 Plan Powerpoint slides	AUTH HEAR
160	JJ	Email from John M. Leonard to Stan Bukotzer re: December 12 PEMC Meeting Minutes	HEAR AUTH
161	JK	Email from Thomas J. Lyons to Stan Bukotzer re: JH Annual Progress Report & Y/E LBE	HEAR AUTH
162	JL	Email from Stan Bukofzer to John M. Leonard, Eugene Sun re: 773 presentation	HEAR AUTH
163	JM	Email from Eugene X. Sun to John M. Leonard, et al., re: 773 memo to Miles	HEAR AUTH
164	JN	Email from Stan Bukofzer to Jeff M. Leiden, et al. re: ABT 773 Memo	AUTH HEAR
165	JO	Letter from Jeff Leiden, John Leonard to Miles/White re: package with key issues	HEAR
166	JP	Letter from Eugene Sun, Stan Bukofzer to Miles White re: package with key issues	HEAR
167	JS	Email from Jeff M. Leiden to Thomas J. Lyons re: 2002 773 LBE	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
168	JT	Email from Stan Bukofzer to Jeff M. Leiden re: ABT 773 documents requested	AUTH HEAR
169	JU	Email from Stan Bukofzer re ABT-773 Communication	AUTH HEAR
170	JW	June Highlights Memo (global outlicensing)	HEAR AUTH
171	JZ	Email from Steve Kuemmerle to Stan Bukofzer re ABT-773 Analysis	AUTH HEAR
172	KB	Kowaluk e-mail with attached pain portfolio profile re: ABT-894	HEAR AUTH
173	KD	Suzanne Lebold e-mail string re: recommend no ABT-594 outlic due to 894	INC HEAR AUTH
174	KE	Email from Kevin Constable to Suzanne Lebold	AUTH HEAR
175	KF	Description of Press Release: ABT-894 PhII Announcement Press Release at: http://www.neurosearch.com/Default.aspx?ID=4080&M=News&PID=22571&NewsID=15415	AUTH HEAR IRREL
176	KJ	Email from Lise Loberg to William Bracken re ABT-894 IND	AUTH HEAR IRREL
177	KK	Email from Bruce McCarthy to David Ross et al re Letter to the FDA	HEAR AUTH
178	KL	Alternative Funding Initiatives	AUTH HEAR
179	KM	Email from Thomas Freyman to Philip Deemer	HEAR AUTH IRREL OPIN
180	KN	Email from Scott Hartz to Stephen Blewitt re Abbott	HEAR AUTH IRREL
181	KO	Email from Philip Deemer to Erik Zimmer et al re Hancock	HEAR AUTH
182	KP	Email from Stephen Blewitt to Steve Cohen re Research and Development Transaction	HEAR
183	KQ	Email from Stephen Blewitt re Abbott	IRREL HEAR
184	KR	Email from Robert Weiland to Rosemarie Waleska et al re Hancock R&D Funding	HEAR AUTH
185	KS	Email from Lynn Klotz to Stephen Blewitt re my cv and thoughts about strategy	HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
186	KT	Email from Philip Deemer to Steve Cohen re John Hancock/Abbott Funding Collaboration	AUTH HEAR
187	KU	Email from Lynn Klotz to Stephen Blewitt re Preliminary Abbott basket analysis	HEAR
188	KV	Email from Philip Deemer to Stephen Blewitt	AUTH HEAR
189	KW	Email from Frank Loughery to Philip Deemer et al re Hancock Deal	AUTH HEAR
190	KZ	Email from Philip Deemer to Barbara Powell re John Hancock Slide describing John Hancock company	HEAR AUTH
191	LA	Email from Steve Cohen to Julia Bouffard et al re John Hancock/Miles meeting	AUTH HEAR
192	LB	Email from Philip Deemer to Steve Cohen re contract to Hancock that Brian wants Arthur to see first	HEAR
193	LC	Email from Philip Deemer to Stephen Blewitt re Draft Research Funding Agreement	HEAR
194	LD	Email from Philip Deemer to John Leonard re Hancock	HEAR AUTH
195	LE	Email from Brewster Lee to Deborah Young et al re Abbott/Hancock - Memo re Research Funding Agreement	HEAR
196	LO	Fax from Philip Deemer to Arthur Higgins re Hancock	AUTH HEAR
197	LQ	Memorandum from Steve Cohen to Dr. Jeffrey Leiden et al re 2001 Plan	AUTH HEAR
198	LR	2001 Plan Assumption Memo - Pass III	AUTH HEAR
199	LV	Email from Elizabeth Koweluk to Steve Kuemmerle et al re Summary of Success Probabilities	AUTH HEAR
200	LZ	Email from Philip Deemer to Chris Turner re Exhibits	HEAR
201	MA	Memorandum from Xavier Frapaise to John Arnott et al re Development Portfolio Review Meeting - March 7-9	AUTH HEAR
202	MB	Memorandum from Matt Russell to Bob Funck et al re 2001 Plan Final Reference Package	INC AUTH HEAR
203	ME	J. Hancock Research Funding Agreement for Abbott: Executive Summary of March 13, 2001 Agreement	AUTH HEAR
204	MG	Email from Elizabeth Kowaluk to Steve Kuemmerle et al re Success Probabilities	AUTH HEAR
205	MK	Email from Philip M. Deemer to Ron Gerlach re John Hancock Royalty Scenario	HEAR AUTH
206	MO	Email from Perry D. Nisen to Azmi A. Nabulsi re MMPI	AUTH HEAR
207	MP	Email from Diane L. D'Amico to Lise I. Loberg re MMPI Activities	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
208	MQ	Email from Thomas Woidat to Kenneth Stiles re Terminated Development Projects (Draft)	AUTH HEAR
209	MR	Email from John Leonard to Vaseern Iftekhhar et al re Terminated Development Projects	AUTH HEAR
210	MS	Email from Robert Funck to Thomas Lyons et al re Hancock - 2002	AUTH HEAR
211	MT	Email from Philip M. Deemer to Ake L. Johansson re Executive Briefing, Global Licensing and Business Development	AUTH HEAR
212	MU	Email from Philip M. Deemer to Ake L. Johansson re Update of Priorities	AUTH HEAR
213	MV	Email from Denise L. Carlson to Fusako H. Bowering re Template for Outlicensing Update	AUTH HEAR
214	MW	Memo from John M. Leonard to Jeff Leiden re Monthly Highlights - October 2001	HEAR
215	MX	Letter from Tom Lyons to Steve Blewitt re Research Funding Agreement dated as of March 13, 2001, 2002 Preliminary Annual Research Plan	HEAR
216	MY	Memo from John M. Leonard to Jeff Leiden re Monthly Highlights - November 2001	HEAR AUTH
217	MZ	Letter from Tom Lyons to Steve Blewitt re Research Funding Agreement dated as of March 13, 2001, 2001 Program Status Report and Related Cost Summary	HEAR
218	NA	Handwritten Note with various attachments	HEAR AUTH
219	NB	Memo from Philip M. Deemer to Pamela Demain re Licensing Opportunities	HEAR AUTH
220	NC	Memo from James L. Tyree to Jeff Leiden re January 2002 Highlights	AUTH HEAR
221	ND	Returns on R&D for 1990s New Drug Introductions	AUTH HEAR
222	NE	Email from John M. Leonard to Thomas J. Lyons et al. re Hancock Response	AUTH HEAR
223	NF	Email from Jennifer L. Baltic to Thomas J. Lyons et al. re Update Hancock Info.	HEAR
224	NH	Email from Gayle A. Kirkpatrick to Suzanne Lebold re Status of JH Compounds/Divestment Activities	HEAR
225	NJ	Memo from James L. Tyree to Jeff Leiden re October 2002 Highlights; Tyree memo dated 4/7/03 re March 2003 highlights; Leonard memo dated 2/13/04 re January 2004 highlights; Tyree memo dated 6/16/04 re May 2004 highlights; Poulos memo dated 8/15/05 re July 2005 highlights; Poulos memo dated 9/12/05 re August 2005 highlights	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
226	NK	Letter from Tom Lyons to Steve Blewitt re Research Funding Agreement dated as of March 13, 2001, (a) 2002 Program Status Report and Related Cost Summary, (b) 2003 Preliminary Annual Research Plan	HEAR AUTH
227	NL	Email from Thomas J. Lyons to Jeff M. Leiden re John Hancock Update	HEAR AUTH
228	NU	Email from Chris Martinez to Michelle Campbell	HEAR
229	NV	Email from Chris Martinez to Michelle Campbell	HEAR
230	NW	Email from Chris Martinez to Michelle Campbell re John Hancock Audit	HEAR
231	NX	Email from Michelle L. Campbell to Chris Martinez re Status of Documents Available for Review re John Hancock Audit	Contains More than One Document HEAR AUTH
232	NY	Email from Chris Martinez to Michelle Campbell re Status of documents available for review	HEAR AUTH
233	OH	Email from Michelle L. Campbell to Mark Hair re Copies of Documents Flagged Today	HEAR AUTH
234	OP	Email from Michelle Campbell to Mark Hair	HEAR AUTH
235	OQ	Email from Mark Hair to Michelle L. Campbell re John Hancock - Abbott Audit Documentation	HEAR
236	OR	Email from Mark Hair to Michelle L. Campbell re Abbott Audit Documentation	HEAR
237	OT	Email from Michelle L. Campbell to Mark Hair re John Hancock Audit	HEAR AUTH
238	OV	Email from Michelle Campbell to Mark Hair	HEAR
239	OZ	Letter from Suzanne A. Lebold to Stephen J. Blewitt re Research Funding Agreement Between Abbott Laboratories and John Hancock dated March 13, 2001	AUTH HEAR
240	PC	Letter from Suzanne Lebold to Stephen Blewitt re Research Funding Agreement Update	HEAR
241	PE	Abbott Laboratories PPD R&D Alternative Financing Analysis John Hancock Funding Scenarios	HEAR AUTH
242	PG	Internal memorandum from Steve Cohen to Jeff and Arthur attaching Hancock package with three additional schedules	HEAR AUTH
243	PJ	Memo from Azmi to Jim re Project Review	HEAR AUTH
244	QS	GPRD APU - J. Leiden Questions	AUTH HEAR
245	RU	Letter from Suzanne Lebold to Stephen Blewitt	HEAR
246	RX	Email from Thomas Woidat to Mike Higgins re Proposed APU Target Adjustments	AUTH HEAR
247	RZ	Abbott-John Hancock Funding Collaboration	AUTH HEAR

Line	PLs' Trial Ex.	Description	Abbott's Grounds for Objection
248	SD	Email from Kenneth Wittenberg to Amy Potthoff, et al re Meeting re Hancock audit	AUTH HEAR Contains more than one document
249	SK	Email from Marilyn Collicott to JSCHANZENBACH@rsi-nc.com@internet re meeting today	AUTH HEAR
250	SL	Email from Andrea Landsberg to Bruce McCarthy re 594 Development Plan	AUTH HEAR
251	SM	Email from Bruce McCarthy to Andrea Landsberg re ABT-594/963 Purdue Meeting	AUTH HEAR

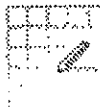


Jeanne M
Fox/LAKE/PPRD/ABBOTT
02/14/2001 01:04 PM

To James Steck/LAKE/PPRD/ABBOTT@ABBOTT
cc Lawrence E Roebe/LAKE/PPRD/ABBOTT@ABBOTT
Subject Re: Studies to Meet Pediatric Rule Requirements

I share your concern and have an even bigger one. In those cases where we are planning to develop an NCE, and we have a target NDA date, I have had difficulty convincing people they have to take the pediatric rule requirements seriously. The answer I keep getting on ABT-773 is "but that project isn't funded". I don't think FDA will buy that answer.

James Steck



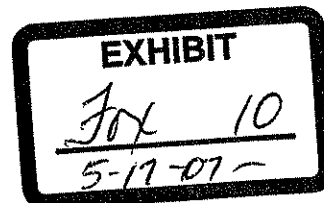
James Steck
02/05/2001 05:20 PM

To: Jeanne M Fox/LAKE/PPRD/ABBOTT@ABBOTT, Lawrence E Roebe/LAKE/PPRD/ABBOTT@ABBOTT
cc:
Subject: Studies to Meet Pediatric Rule Requirements


Jeanne and Mick


This is just a heads up to let you know that there may be some issues arising in the future about concerns for being able to do studies requested by FDA to meet pediatric rule requirements because these studies "are not funded". Steve and I are running into discussions on this for Depakote ER in migraine where FDA has asked us to do an efficacy study in migraine per the the pediatric rule. Of course we will attempt to negotiate with FDA to do the least onerous studies that will still satisfy the pediatric rule requirements, but folks will need to be advised at some point (preferably early on) that meeting this rule is a regulatory obligation and a cost of doing business. I'd appreciate hearing any thoughts you have on this subject.

Jim



CONFIDENTIAL
ABBT0568172


 Elizabeth
Kowaluk/LAKE/PPRD/ABBO
TT
11/30/2000 05:08 PM


To: Bryan F Cox/LAKE/PPRD/ABBOTT@ABBOTT
cc
bcc
Subject: Re: 12/6 meeting 

Interesting - I wonder that is based on?

Liz

Bryan F Cox

 Bryan F Cox
11/30/2000 05:05 PM

To: Elizabeth Kowaluk/LAKE/PPRD/ABBOTT@ABBOTT
cc:
Subject: Re: 12/6 meeting 

Wouldn't miss it for the world. Sadly though, our die may be cast. At SAC today, Jeff Leiden put up a slide today listing ABT-822 as Commercial Viability Questionable.

Of course, ABT-594 was painted with the same brush.

Bryan

Jim,

Greetings.

We had a project review with upper management this Wednesday. During this review there was a concern regarding the continuation with ABT-518 development. Although, we thought that we will be allowed to continue at this time, I and Perry have learned, 45 minutes ago, that we should stop all development activities immediately. As much as I hate to do this to you, I would like to ask you to communicate with Drs. Zonnenberg and Schellen that we are not proceeding with the trial as a result of the projects re-prioritization following the acquisition of Knoll. I will call you on your mobile phone (I do not have your home #) to discuss this further with you and check your comfort level with this very difficult task. If you prefer to call me, my home number: 847-382-3818, mobile : 847-380-5830. As you know, at AZU they are expecting a patient Monday morning, so this has to be done ASAP.

I did not have the chance to tell Todd and Diane D. this news since I was informed late in the day and they have left already. So please do not copy others until I have a chance to inform them directly.

Thanks

Azmi



Pharmaceutical Licensing & New Business Development

FROM: James L. Tyree
Corporate Vice President
Dept. R50 AP34-2
Tel: (847) 938-0101
Fax: (847) 937-1771

TO: Jeff Leiden

Date: February 13, 2002

cc: Global Pharmaceutical Licensing & New Business Staff

C. Begley
B. Dempsey
D. Goffredo
R. Gonzalez
B. Kamen
J. Leonard
D. Norbeck
E. Ogunro
S. Murphy
S. Weger
T. Freyman
M. White
L. Wyatt

RE: January 2002 Highlights

I. CONCLUDED BUSINESS

Project Leaf (Co-dev): Abbott has elected to terminate further negotiations with Novartis for the co-development of LAF237 for Type II Diabetes following extensive discussions.

Lilly's Opioid Antagonists (License): This opportunity was declined due to insufficient patent life (composition of matter).

Emisphere Oral Heparin (License): Due diligence on this Phase III opportunity was conducted in January. The review with senior management confirmed the decision not to proceed with further discussions for this product based on the due diligence results.

II. PENDING FINAL RESOLUTION

Negotiations

Uprima-Japan: Exclusive rights for Uprima in Japan are being negotiated with Takeda. The agreement is targeted for execution by the end of February.

Project Galleon (Co-promo/Acquisition): Negotiations for the co-promotion of Gatifloxacin (quinolone) in EU are ongoing with Grunenthal. Negotiations are expected to be finalized by the end of February. A Gatifloxacin acquisition analysis has been initiated for the US. Valuation analysis of various deal structures will be presented to senior management by the end of February.

TET (Gene Regulation Technology, Divestiture and Licensing): Divestiture: ABC sent a letter to all parties who requested confidential packages, indicating Abbott's preferred bid structure. Deltagen has sent an offer of \$15MM, comprised of cash and non-cash considerations to purchase the asset including all revenues from existing licenses. All bids are due mid-February and the next steps will be determined pending the offers. Commercial licenses: Cell Genesys, Ceregene, CellFactors, and Virxsys have expressed interest in non-exclusive commercial licenses to the technology. ABC has drafted term sheets for these companies and has scheduled teleconferences to discuss these terms.

Yeast Display (Out-Licensing): Introductory letters announcing Abbott's acquisition of the yeast display technology were sent out to about 20 companies expressing interest in the technology. After receiving introductory letters, both Maxygen and Zymogenetics have expressed interest in further discussing licenses to the technology.

Due Diligence

Project Zeus (Divestiture): A non-binding term sheet was received from Virbac for the purchase of Zeus assets. Due diligence is scheduled for February 14-15.

Project Thunderbird (Acquisition): An assessment is underway for the acquisition of Tequin, BMS's quinolone in the US. Estimated peak sales in the US could reach greater than \$700MM by 2007.

Highly Confidential

ABBT247161

Project Blue Sun (Divestiture): Abbott is in the process of divesting the worldwide Selsun shampoo business. Management presentations are scheduled for early February. Abbott requires at least twice the sales or \$80MM in order to continue the process. HSR needs to be submitted by late February or early March in order for Ross to achieve Q102 recognition of the gain. A gain may be taken beyond Q2 with the potential of 2003 carryover due to registration issues.

Project Dakota (Partnering): Abbott is in the process of finding a partner to maximize D2E7 in comprehensive promotional and clinical development collaboration. Disease areas under consideration include rheumatoid arthritis; Crohn's disease; psoriasis; psoriatic arthritis and others. A meeting was held with Novartis in New Jersey on February 7. Novartis' proposal will be reviewed with senior management mid-February to define the next steps.

Triangle Strategic Overview: A presentation reviewing the original Triangle deal expectations, their current product portfolio valuation, an outline of strategic options, and a recommendation will be submitted to senior management in February. Of the four potential drugs in development at Triangle, the focus of the analysis is on Coviracil (FTC) and DAPD and the potential combination product with Gilead's Tenofovir (Project Geometry). A worldwide co-promotion of a combination product Tenofovir (an approved drug) and Coviracil (FTC) for HIV (not yet approved) is financially modeled based upon a 70/30 profit split. Discussions with Gilead on the combination are advancing with regulatory and clinical data regarding Coviracil being provided to Gilead by Triangle.

Project Garden (Divestiture): Abbott is analyzing the divestiture of Gengraf. Discussions are proceeding with Sangstat. A number of other parties have declined interest in acquisition.

Hydra (Equity and Research Collab): A non-binding term sheet containing equity terms and milestones for two research collaboration agreements that include option rights to products has been proposed. The two research collaborations involve the elastin oligopeptide-coated stent project in the prevention of restenosis and the CatSper ion channel for potential in male infertility and/or contraception.

Pending Go/No-Go Decision

Gilead Tenofovir (License): FTC combination product commercial assessment and business discussions on-going. Further technical assessment has been deferred pending the outcome.

Project Gladiator (Acquisition): The analysis of the GSK Anesthesia business in Europe & PAA is being updated. A go/no-go decision is pending final due diligence and commercial analysis.

Biogen (Amevive) Project Acorn (Co-promo): A co-promotion of Amevive for psoriasis in Latin America has been modeled based upon preliminary deal terms. Biogen concerns center on potential conflict with D2E7 in psoriasis market. A go/no-go decision is scheduled for mid-February.

Lundbeck (S-citalopram, Co-promo): A co-promotion of the S-citalopram, an SSRI anti-depressant in Latin America is being financially modeled. Meeting scheduled with Lundbeck 2/13 to discuss deal model/terms. Next step: evaluate forecast/terms in model for go/no-go.

Project Rhythm (Co-promo/mkt): A co-promotion / co-market of P&G's Azimilide for CV antiarrhythmia (worldwide ex-Japan) has been modeled based upon preliminary deal terms. A go/no-go decision is scheduled for mid-February, pending commercial support in bringing forward based on forecast/estimated deal terms and impact.

Chiron HCV IP (License): Negotiations are continuing for non-exclusive rights to two targets for drug discovery.

Myriad Novel Depression Genes/Targets (Collaboration): Negotiations for a definitive agreement are ongoing with a target for execution by February 28th. A Press Release is being routed for approval.

III. NEW INITIATIVES

Taisho (Overview): Prepared a comprehensive overview of Taisho for senior management meeting with Taisho, 2/15.

ABT-773 (Partnering): Taisho has been informed of the decision to stop the global development of ABT-773 except for the Japan market place. A strategy for the partnering of ABT-773 is being developed and will be reviewed with management at the end of February.

ICOS IC485 (License): Technical discussions w/ICOS regarding this PDE-4 inhibitor that is in Phase I for RA scheduled for February.

ABT-598 (Outlicense): Presented deal terms to Icagen who indicated they would not make any cash upfront payment for the asset (urinary incontinence DDC asset). Discussions with Icagen have concluded and an outlicensing package is being drafted.

TAT Licensing Process: The TAT teams have developed a list of licensing opportunities based on the LRP. The LSP will be finalized at the end of February.

Abbott's Licensing and Business Development Web Site: An external web site was developed and presented to senior management which markets Abbott's businesses, research focus and targeting biotech companies, venture capitalists and universities, to access novel targets and technologies. The web site address is <http://Licensing.Abbott.com> and the email address Licensing@Abbott.com will be launched in March.

TAB D

Abbott's Revised Proposed Trial Exhibit List

February 4, 2008

Trial Exhibit Number	Date	Bates Range	Deposition Exhibit Number	DESCRIPTION
500	undated	ABBT0006627 - ABBT0006700		
502	undated	JH002993 - JH002997		
503	undated	ABBT0577899 - ABBT0577913		
504	undated	ABBT0577959 - ABBT0577984		
506	undated	JH000695 - JH000727		
507	undated	ABBT372493 - ABBT372494		
508	undated	AND00001 - AND00015		
509	undated	ABBT0556317 - ABBT0556317		
510	undated	AND00033 - AND00092		
511	undated	ABBT0051885 - ABBT0051888		
512	undated	JH0021645 - JH0021646		
513	undated	ABBT0047907 - ABBT0047908		
515	undated	JH000655 - JH000658		
516	undated		Gold Depo Exhibit No. 1	Dr. Gold Expert Report
517	undated	JH002180 - JH002201		
518	undated	JH001103 - JH001104		
519	03/00/2001	ABBT0155602 - ABBT0155608		McKinsey Initial Portfolio Prioritization
520	undated	ABBT203446 - ABBT203450		
521	undated	JH0021956 - JH0021958		
522	07/00/1995	JH001446 - JH001459		
523	5/13/1997	JH0012335 - JH0012354		
524	6/5/1998	JH0012446 - JH0012446		
525	6/10/1998	JH0012404 - JH0012411		
526	8/29/1998	JH001702 - JH001706		
527	9/9/1998	JH001694 - JH001698		
528	1/13/1999	JH0012240 - JH0012250		
529	3/24/1999	JH002090		
530	5/6/1999	JH001699 - JH001701		
531	06/00/1999	ABBT0018986 - ABBT0019095		
532	6/4/1999	JH0012420 - JH0012428		
533	6/25/1999	JH0012277 - JH0012283		
534	6/29/1999	ABBT0020546 - ABBT0020551		
535	7/1/1999	JH0012251 - JH0012262		
536	8/20/1999	JH0012449 - JH0012461		

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540	11/21/1999	JH000767 - JH000770		
541	12/21/1999	ABBT0051889 - ABBT0051889		
542	00/00/2000		Hartz Depo Exhibit No. 18	
543	00/00/2000		Nastou Depo Exhibit No. 4	
544	00/00/2000	ABBT338037 - ABBT366059		
545	00/00/2000	JH0021620 - JH0021626		
546	00/00/2000	JH002212 - JH002226		
547	00/00/2000		Klotz Depo Exhibit No. 30	
548	00/00/2000	ABBT0003362 - ABBT0003370; ABBT0003416 - ABBT0003418; ABBT329442 - ABBT329558; ABBT299286-ABBT299297; ABBT299147-ABBT299158		
549	1/28/2000	JH002312 - JH002313		
550	2/8/2000	ABBT0065818 - ABBT0065896		
551	2/29/2000	ABBT0065897 - ABBT0065981		
552	3/7/2000	JH002308 - JH002309		
553	3/9/2000	ABBT0141929 - ABBT0141983		
554	04/00/2000	ABBT0107546 - ABBT0107551		
555	4/5/2000	ABBT246414 - ABBT246415		
558	5/2/2000	AL000135 - AL000135		
559	5/8/2000	JH002423 - JH002429		
560	5/9/2000	ABBT242357 - ABBT242361		
561	5/11/2000	JH000747 - JH000761		
562	5/16/2000	ABBT364740 - ABBT364740		
563	5/26/2000	ABBT0008178 - ABBT0008181		
564	5/31/2000	ABBT246447 - ABBT246454		
566	06/00/2000	ABBT0570747 - ABBT0570770		
567	6/2/2000	JH003089 - JH003100		
568	6/5/2000	ABBT246466 - ABBT246471		
569	6/7/2000	AL000198 - AL000199		
570	6/8/2000	JH0012376 - JH0012388		
572	6/20/2000	ABBT0510354 - ABBT0510483		
573	6/20/2000	JH003080 - JH002090		
574	6/27/2000	JH003058 - JH003069		
575	6/27/2000	AL000115 - AL000119		
576	07/00/2000		Klotz Depo Exhibit No. 28	

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577	7/3/2000	JH003032 - JH003057		
578	7/4/2000	JH003027 - JH003031		
581	7/7/2000	ABBT0082516 - ABBT0082516		
582	7/11/2000	JH003014 - JH003026		
583	7/11/2000	JH003007 - JH003013		
585	7/14/2000	JH000675 - JH000678		
586	7/18/2000	JH002999 - JH003001		
587	7/21/2000	JH002993 - JH002997		
588	7/23/2000	JH002984 - JH002988		
590	7/28/2000	JH002973 - JH002979		
591	08/00/2000	ABBT256634 - ABBT356645		
593	8/4/2000	AL000099 - AL000102		
594	8/11/2000		Klotz Depo Exhibit No. 29	
597	8/17/2000	AL000138-AL000175		
599	8/29/2000	ABBT0080232 - ABBT0080233		
604	9/15/2000	ABBT242156 - ABBT242156		
606	9/18/2000	JH003342 - JH003346		
607	9/18/2000	JH0021647 - JH0021649		
608	9/21/2000	JH001185 - JH001202		
609	9/21/2000	JH005573 - JH005573		
610	9/21/2000	JH001203 - JH001220		
613	9/28/2000	ABBT233741 - ABBT233749		
614	9/28/2000	ABBT233741 - ABBT233749		
615	9/28/2000	ABBT0051892 - ABBT0051904		
616	9/29/2000	ABBT0105598 - ABBT0105598		
617	10/3/2000	ABBT0107081 - ABBT0107081		
619	10/10/2000	JH002373 - JH002390		
620	10/10/2000	JH005551 - JH005553		
622	10/26/2000	JH007701 - JH007701		
623	10/27/2000	JH000778 - JH000778		
624	11/00/2000	ABBT144600.UR - ABBT144609.UR		
625	11/1/2000	ABBT245829 - ABBT245835		
626	11/1/2000	JH003740 - JH003814		
627	11/10/2000	JH005273 - JH005348		
628	11/20/2000	ABBT0558681 - ABBT0558683		
629	11/21/2000	JH004980 - JH004988		
630	11/27/2000	ABBT205257 - ABBT205259		

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631	11/28/2000	ABBT314979 - ABBT314987		
632	12/00/2000	ABBT0017554 - ABBT0017554		
633	12/5/2000	ABBT0577000 - ABBT0577168		
634	12/14/2000	ABBT233539 - ABBT233540		
635	12/21/2000	ABBT0118174 - ABBT0118203		
636	00/00/2001	ABBT0010550 - ABBT0010576		
637	00/00/2001	ABBT0063643 - ABBT0063649		
638	01/00/2001	ABBT0000302 - ABBT0000308		
639	01/00/2001	ABBT0000322 - ABBT0000327		
641	1/15/2001	ABBT0108884 - ABBT0108885		
642	1/25/2001	ABBT301935 - ABBT301941		
643	1/25/2001	ABBT0012433 - ABBT0012454		
644	1/25/2001	ABBT0102282 - ABBT246130		
645	1/31/2001	ABBT0014658 - ABBT0014665		
646	02/00/2001	JH008153 - JH008158		
647	02/00/2001	JH008159 - JH008164		
648	02/00/2001	JH008165 - JH008173		
649	02/00/2001	JH008174 - JH008178		
650	02/00/2001	JH008179 - JH008185		
651	02/00/2001	JH008186 - JH008192		
652	02/00/2001	JH008193 - JH008199		
653	02/00/2001	JH008200 - JH008205		
654	02/00/2001	JH008206 - JH008209		
655	02/00/2001	ABBT0000412 - ABBT0000417		
656	02/00/2001	ABBT0000387 - ABBT0000399		
657	2/2/2001	ABBT292664 - ABBT294198		
659	2/6/2001	ABBT0012431 - ABBT0012432		
660	2/12/2001	ABBT205042 - ABBT205046		
661	2/12/2001	ABBT0576828 - ABBT0576871		
662	2/15/2001	JH006299 - JH006359		
663	2/22/2001	ABBT204959 - ABBT205279		
664	2/27/2001	ABBT0114639 - ABBT0114639		
665	2/28/2001	ABBT0576918 - ABBT0576923		
666	2/28/2001	ABBT0003465 - ABBT0003465		
667	03/00/2001	ABBT287552 - ABBT287557		
668	03/00/2001	ABBT0000349 - ABBT0000354		March 2001 ABT-518 Monthly Status Project Report

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669	03/00/2001	ABBT0000429 - ABBT0000438		
670	03/00/2001	ABBT271783 - ABBT271816		
671	3/1/2001	ABBT0164029 - ABBT0164036		
672	3/2/2001	ABBT0037509 - ABBT0037608		
673	3/6/2001	ABBT0119894 - ABBT0119895		
675	3/8/2001	ABBT0060705 - ABBT0060706		
676	3/9/2001	ABBT297558 - ABBT297583		
678	3/9/2001	JH008376 - JH008384		
679	3/9/2001	ABBT0048632 - ABBT00048645		
680	3/9/2001	ABBT0092919 - ABBT0092921		
681	3/9/2001	ABBT0013203 - ABBT0013214		
682	3/12/2001	ABBT0059464 - ABBT0059464		
683	3/12/2001	JH010033 - JH010142		
684	3/13/2001	JH008074 - JH008211		
686	3/13/2001	JH021612 - JH021619		
687	3/13/2001	JH001103 - JH001104		
688	3/13/2001	JH021607 - JH021611		
690	3/13/2001	JH021612 - JH021619		
691	3/14/2001	ABBT0060789 - ABBT0060789		
695	3/16/2001	ABBT0012388 - ABBT0012390		
696	3/16/2001	ABBT0509109 - ABBT0509109		
697	3/19/2001	ABBT120465.UR - ABBT120513.UR		
698	3/21/2001	ABBT364018 - ABBT364020		
699	3/22/2001	ABBT300130 - ABBT300132		
700	3/26/2001	ABBT360531 - ABBT360573		
701	04/00/2001	ABBT0000355 - ABBT0000360		
702	04/00/2001	ABBT0000491 - ABBT0000496		
704	4/3/2001	ABBT0033510 - ABBT0033516		
705	4/12/2001	ABBT0026337 - ABBT0026338		
706	4/23/2001	ABBT0001749 - ABBT0001758		
707	4/27/2001	ABBT110591.UR - ABBT110591.UR		
708	05/00/2001	ABBT0000508 - ABBT0000519		
709	5/2/2001	ABBT0001769 - ABBT0001839		
710	5/4/2001	ABBT0054230 - ABBT0054231		
711	5/4/2001	ABBT335154 - ABBT335154		
712	5/7/2001	ABBT361448 - ABBT361455		
713	5/9/2001	ABBT294559 - ABBT294560		

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714	5/12/2001	ABBT0556321 - ABBT0064234		
715	5/20/2001	ABBT0037615 - ABBT0037616		
716	5/21/2001	ABBT0164581 - ABBT0164581		
717	5/22/2001	ABBT0064226 - ABBT0064233		
718	5/28/2001	ABBT0033486 - ABBT0033494		
719	6/7/2001	ABBT0045226 - ABBT0045227		
720	6/7/2001	ABBT0026340 - ABBT0026342		
721	6/7/2001	ABBT0054387 - ABBT0054387		
722	6/11/2001	ABBT0063625 - ABBT0063626		
723	6/17/2001	ABBT224941 - ABBT224983		
724	6/20/2001	ABBT229367 - ABBT229448		
725	6/20/2001	MCK00014 - MCK00108		
726	6/21/2001	ABBT0507879 - ABBT0507879		
727	6/28/2001	JHII021462 - JHII021462		
728	07/00/2001	ABBT0000612 - ABBT0000618		
729	07/00/2001	ABBT0000589 - ABBT0000598		
730	7/9/2001	ABBT288530 - ABBT288530		
731	7/13/2001	ABBT209793 - ABBT209829		
732	7/23/2001	ST-AUDIT18511 - ST-AUDIT18594		
733	7/23/2001	ABBT103191.UR - ABBT103270.UR		
734	7/30/2001	ABBT245647 - ABBT245647		
735	7/30/2001	ABBT317214 - ABBT317214		
736	8/6/2001	ABBT0049990 - ABBT0049990		
738	8/10/2001	ABBT0049970 - ABBT0049977		
739	8/14/2001	ABBT0049980 - ABBT0049981		
740	8/16/2001	ABBT289332 - ABBT289344		
741	8/21/2001	ABBT0001974 - ABBT0002029		
742	8/21/2001	ABBT311519 - ABBT311637; ABBT127868.UR - ABBT127868.UR		
745	9/13/2001	ABBT127868.UR - ABBT127868.UR		
746	9/17/2001	ABBT245619 - ABBT245619		
747	9/20/2001	ABBT203477 - ABBT203484		
748	9/20/2001	JH008372 - JH008372		
749	9/27/2001	ABBT113285.UR - ABBT113315.UR		
751	9/28/2001	ABBT245788 - ABBT245805		
752	10/00/2001	ST-AUDIT13231 - ST-AUDIT13235		
754	10/2/2001	ABBT201003 - ABBT201007		

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755	10/9/2001	ABBT246335 - ABBT246335	
761	11/16/2001	ABBT0033833 - ABBT0033833	
762	11/20/2001	ABBT0025973 - ABBT0025973	
763	11/26/2001	JH000787 - JH000802	
765	12/18/2001	JH001065 - JH001068	
766	12/31/2001	JH0021496 - JH0021498	
767	1/7/2002	ABBT207773 - ABBT207775	
774	7/11/2002	ABBT203446 - ABBT203453	
775	8/6/2002	ABBT333998 - ABBT333998	
776	9/26/2002	AUDIT 002790 - AUDIT 002790	
777	9/30/2002	JH003142 - JH003158	
779	10/16/2002	AUDIT 002791 - AUDIT 002793	
780	11/7/2002	ABBT0518029 - ABBT0518031	
781	12/00/2002	ABBT220660 - ABBT220672	
782	12/6/2002	ABBT0518032 - ABBT0518034	
783	12/20/2002	JH009977 - JH009978	
784	12/20/2002	JH000807 - JH000817	
785	00/00/2003	JH0021620 - JH0021626	
786	00/00/2003	JH0021627 - JH0021635	
787	1/16/2003	ABBT0016048 - ABBT0016051	
788	1/22/2003	JH001105 - JH001105	
789	1/30/2003	JH001111 - JH001168	
790	2/28/2003	ABBT335048 - ABBT335050	
792	3/14/2003	JH002447 - JH002447	
794	4/13/2003	JH003122 - JH003136	
795	06/00/2003	JH0021645 - JH0021646	
796	6/11/2003	JH003113 - JH003115	
800	9/22/2003	JH001071 - JH001091	
801	11/12/2003	ABBT0004519 - ABBT0004520	
802	11/12/2003	JH001283 - JH001290	
804	12/19/2003	JH0012075 - JH0012078	
805	12/23/2003	JH002323 - JH002339	
806	00/00/2004		Walsh Depo Exhibit No. 7
807	00/00/2004	CRA00127 - CRA00139	
809	3/19/2004	JH0012071 - JH0012074	
810	4/12/2004	JH0011883 - JH0011886	
812	5/10/2004	ABBT0000057 - ABBT0000058	

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813	5/18/2004	ABBT0000061 - ABBT0000064		
814	6/10/2004	ABBT0190551 - ABBT0190552		
815	6/15/2004	ABBT0000077 - ABBT0000078		
816	6/23/2004	ABBT0000114 - ABBT0000114		
817	7/19/2004	ABBT0000265 - ABBT0000266		
818	8/5/2004	ABBT0000125 - ABBT0000127		
819	8/6/2004	ABBT0126614 - ABBT0126615		
820	8/31/2004	ABBT0000257 - ABBT0000260		
821	8/31/2004	ABBT0126635 - ABBT0126639		
822	9/9/2004		Blewitt Depo Exhibit No. 21	
823	9/13/2004	JHII012067 - JHII012070		
824	9/28/2004	ABBT0000255 - ABBT0000256; ABBT0126645 - ABBT0126647		
826	10/26/2004	ABBT0000250 - ABBT0000253		
827	10/27/2004	JHII011289 - JHII011291		
828	11/5/2004	ABBT0000137 - ABBT0000138		
829	11/16/2004	ABBT0027246 - ABBT0027263		
831	12/2/2004	JHII011295 - JHII011295		
832	12/3/2004	ABBT0126668 - ABBT0126669		
833	12/13/2004	ABBT0027991 - ABBT0028015		
834	12/13/2004	JHII012062 - JHII012066		
835	1/4/2005	JH0111167 - JH0111168		
837	1/18/2005	ABBT0000235 - ABBT0000235		
838	1/18/2005	ABBT0000235 - ABBT0000235		
839	1/31/2005	ABBT0126905 - ABBT0126908		
840	2/24/2005	JHII011221 - JHII011221		
841	3/9/2005	JHII021636 - JHII021636		
843	3/11/2005	JHII021637 - JHII021637		
844	3/15/2005	ABBT0000280 - ABBT0000284		
845	3/16/2005	JHII021644 - JHII021644		
846	3/17/2005	JHII021526 - JHII021594		
847	3/18/2005	JHII021638 - JHII021643		
848	3/22/2005	ABBT0126575 - ABBT0126575		
849	3/25/2005	ABBT0000270 - ABBT0000271		
850	3/27/2005	ABBT0005098 - ABBT0005112; 2606980; 2602418		
851	3/28/2005	JHII021598 - JHII021598		

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854	6/13/2005	JHII012079 - JHII012083		
856	9/6/2005	JHII012056 - JHII012061		
857	9/15/2005	ABBT372504 - ABBT372504		
859	12/6/2005	JHII012050 - JHII012055		
860	1/20/2006	ABBT0026105 - ABBT0026116		
861	2/6/2006		Martinez Depo Exhibit No. 7	
864	5/25/2007		Fairweather Depo Exhibit No. 3	
865	5/29/2007		Fairweather Depo Exhibit No. 2	
866	5/29/2007		Gold Depo Exhibit No. 2	
867	5/29/2007		Gold Depo Exhibit No. 3	
868	undated			Electronic version of Monte Carol Simulation (Excel spreadsheet) produced by John Hancock.
869	undated		Hartz Depo. Exh. 18.	Electronic version of Stone Turn Index (Excel spreadsheet) titled John Hancock-Document Index.
870	Various Dates	ST-AUDIT00001 - ST-AUDIT42765.		All documents with prefix ST-AUDIT.
871	2001	MCK00537-539	Hopfield Depo. Exh. 14	Project Map - 2001.
872	Mar. 16, 2001	ABBT0033105		Single-page Letter from Dr. Nabulsi and Dr. Janus to Prof. Schellens.
873	Mar. 16, 2001	ABBT0033117		Single-page Letter from Dr. Nabulsi and Dr. Janus to Dr. Zonnenberg.
874	Mar. 16, 2001	ABBT0033118		Single-page Letter from Dr. Nabulsi and Dr. Janus to Dr. Voest.
875	12-May-01			ASCO News Release titled, Nearly 25,000 Cancer Specialists Meet in San Francisco for ASCO Annual Meeting.

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876	13-Oct-06		Rodda Depo. Exh. 3	Expert Report of Dr. Bruce Rodda
877	13-Oct-06		Friedman Depo. Exh. 1	Expert Report of Alan Friedman
878	13-Oct-06		Gold Depo. Exh. 1	Expert Report of Dr. Barry I. Gold
879	Jan. 19, 2007		Tucker Depo. Exh. 2	Expert Report of Avram S. Tucker
880	19-Jan-07		Fairweather Depo. Exh. 1	Expert Report of Dr. William R. Fairweather
881	Feb. 20, 2007			Life Science Weekly Article titled, Recent Reports from Advanced Life Sciences Holdings provided and update.
882	26-Feb-07		Rodda Depo. Exh. 2	Expert Report of Dr. Bruce Rodda (Statistical Issues)
883	11-Jun-07			Crain's Chicago Business Article titled, Waiting to Exhale. Day of Reckoning nears as biotech firm Advanced Life awaits trial results on new treatment for pneumonia by Mike Colias.
884	21-Jun-07			Advanced Life Sciences News Release titled, Cethromycin Achieves Primary Endpoint in Pivotal Phase 3 Pneumonia Clinical Trial.
885	25-Jun-07			Advanced Life Sciences Form 8-K for the period of June 21, 2007.
886	29-Jun-07			Crain's Chicago Business Article titled, Waiting to Exhale. Clinical Trials by Mike Colias.
887	Aug. 15, 2007			Sanofi-Aventis February 2007 internet Ketek product description.

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888	Aug. 15, 2007			U.S. Food and Drug Administration Center for Drug Evaluation and Research Web Page Article titled, Drug-Induced Liver Toxicity.
889	Aug. 21, 2007			Life Science Weekly Article titled, Reports from Advanced Life Sciences Holdings describe recent developments.
890	3-Dec-07			Supplemental Expert Report of Avram S. Tucker
891	3-Dec-07			Revised Expert Report of Alan Friedman
892	3-Dec-07			Revised Expert Report of Dr. Barry I. Gold
895	2/00/2001			ABBT0000343-348
896	12/12/2003			Complaint in <i>Hancock Life Ins. Co., et al. v. Abbott Laboratories</i> , No. 03-12501 (<i>Hancock I</i>)
897	5/18/2004			Letter from Lawrence R. Desideri to Brian A. Davis dated May 18, 2004
898	6/4/2004			Letter from Lawrence R. Desideri to Brian A. Davis dated June 3, 2004
899	6/16/2004			Letter from Stephen V. D'Amore to Raymond O'Brien dated June 16, 2004
900	6/18/2004			Letter from Stephen V. D'Amore to Raymond O'Brien dated June 18, 2004
901	6/23/2004			Letter from Lawrence R. Desideri to Brian A. Davis dated June 23, 2004

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902	6/30/2004			Letter from Stephen V. D'Amore to Raymond O'Brien dated June 30, 2004
903	8/5/2004			Letter from Lawrence R. Desideri to Karen Collari Troake dated August 5, 2004
904	8/24/2004			Letter from Lawrence R. Desideri to Karen Collari Troake dated August 24, 2004
905	9/29/2004			September 29, 2004 Affidavit of Stephen J. Blewitt
910	1/28/2005			Letter from Stephen V. D'Amore to Brian A. Davis dated January 28, 2005
911	2/11/2005			Letter from Stephen V. D'Amore to Brian A. Davis dated February 11, 2005
912	2/15/2005			Letter from Stephen V. D'Amore to Brian A. Davis dated February 15, 2005
913	4/21/2005			Letter from Stephen V. D'Amore to Brian A. Davis dated April 21, 2005
914	6/3/2005			Complaint
915	7/29/2005			Answer to Complaint
916	9/16/2005			District Court's Memorandum and Order granting Hancock's Motion For Summary Judgment
920	10/13/2005			Transcript of Court's Status Conference Hearing
923	11/7/2005			Abbott's Response to Hancock's First Request for Production of Documents
924	11/28/2005			Letter from Stephen D'Amore to Brian A. Davis.
926	12/9/2005			Letter from Stephen D'Amore to Brian A. Davis, dated 12/9/05

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928	2/6/2006			Hancock's Responses and Objections to Abbott's 1st Set of Interrogatories
929	3/28/2006			Letter from Applied Discovery, Inc. to Stacy Blasberg reflecting production of Bates Range ABBT200001- ABBT367508.
931	5/10/2006			Hancock's Supplemental Responses To Abbott's Interrogatories Nos. 5(c), 5(d), 6(c), 6(d), and 10.
934	6/23/2006			Hancock's Responses and Objections to Abbott's 2nd Set of Interrogatories
935	6/23/2006			Supplemental Complaint
937	7/13/2006			Abbott's Supplemental Responses and Objections To Plaintiffs' Rule 30(b)(6) Deposition Notice (Audit)
939	9/28/2006			First Circuit Court of Appeal's decision affirming the District Court's Order
941	12/6/2006			Transcript of Hearing before Honorable Douglas P. Woodlock
943	12/29/2006			First Amended Supplemental Complaint
945	1/12/2007			Answer to Amended Complaint (Docket # 107)
947	3/6/2007			Letter from Ozge Guzelsu to Richard Abati, enclosing documents.
952	4/30/2007			Hancock's Responses and Objections to Abbott's 3rd Set of Interrogatories
953	6/4/2007			Email from Eric Lorenzini to Richard Abati regarding interrogatory responses

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954	6/28/2007			Email from Karen Collari Troake to Eric Lorenzini, confirming that Abbott will produce the set of documents that StoneTurn received in the audit.
955	7/3/2007			Letter from Deborah Dion to Eric Lorenzini, producing the ST-AUDIT documents.
956	7/16/2007			Hancock's Supplemental Responses to Abbott Interrogatory Nos 2, 3, 5(A)(B)(F), 6(A)(B)(F), and 7
960	10/25/2007			Transcript of Pre-trial Conference
961	11/8/2007			Second Amended Complaint (Docket # 198)
962	11/8/2007			Letter from Brian Davis to Gregory Phillips attaching chart.
963	11/15/2007			Email from Richard Abati to Eric Lorenzini attaching Redline comparing First Amended Complaint to Second Amended Complaint.
964	11/29/2007			Answer to Amended Complaint (Docket # 204)
966	4/6/2001	ABBT0176908 - 0176909		Email thread re Azmi's Weekly Update
967	2/2/2001	ABBT0002314 - ABBT0002489	Leonard 36; Collicot 32	Project Review ABT-089 and ABT-594
968	12/11/2000	ABBT0125549		Calendar Entry Meeting ABT- 594 Power Calculators w/Siber, Morris, Leonard
969	12/21/2000	ABBT112987.ur - ABBT112992.ur		Assumption Memos - Monthly Highlights
970	1/00/2001	ABBT0012369 - ABBT0012387		Portfolio Analysis January 2001 Review Reference Materials

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972	4/00/2001	ABBT0032090 - ABBT0032144	Portfolio Analysis April 2001 Review PPD and Knoll Assets Reference Materials
973	5/23/2001	ABBT354519 - ABBT354520	E-mail thread re ABBT-594 2001 Budget
974	3/7-9/2001	ABBT232209 - ABBT232232	Abbott Portfolio Review March 7-9, 2001
975	3/7-9/2001	ABBT0116656 - ABBT0116659	Portfolio Review Meeting Documents
979	8/16/2001	ABBT0048631	Interoffice memorandum re ABBT- 594 Review, August 21, 2001, Pharmaceutical Executive Management Committee
980	8/7/2001	ABBT0120919 - ABBT0120921	E-mail thread re PEMC 8/21 Agenda
983	10/5/2001	ABBT224537 - ABBT224539	E-mail thread re New Agenda for Monday's PEC Meeting
984	10/5/2001	ABBT0111238 - ABBT0111240	E-mail thread re October 8 program
985	10/8/2001	ABBT334009 - ABBT334011	Interoffice memorandum re Monthly Highlights - September 2001
986	10/18/2001	ABBT304685	E-mail re Highlights
987	11/15/2001	ABBT0165160 - ABBT0165162	E-mail thread re 2002 Goals
988	2/14/2003	ABBT0009617 - ABBT0009618	Out-license Anti-infective Compounds Board Document February 14, 2003 Draft 8
989	3/27/2001	ABBT327314 - ABBT327327	E-mail thread re therapeutic strategy evaluations attaching briefing document portfolio review
990	5/2-4/2001	ABBT0048541 - ABBT0048584	Pain Therapeutic Area - Global Pharmaceutical R & D strategy retreat May 2-4, 2001
991	5/2-4/2001	ABBT0060730 - ABBT0060767	Abbott Oncology - Global Pharmaceutical R & D Strategy Retreat May 2-4, 2001

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992	12/12/2000	ABBT0569030		Calendar Entry Rescheduled Meeting ABT - 773 Project Review
993	4/27/2001	ABBT143066.ur - ABBT143067.ur		Interoffice Memorandum re Monthly Highlights April 2001
994	8/10/2001	ABBT0003466 - ABBT0003467		Interoffice Memorandum re Monthly Highlights July 2001
995	10/8/2001	ABBT0003482 - ABBT0003484		Interoffice Memorandum re Monthly Highlights September 2001
996	11/9/2001	ABBT0003478 - ABBT0003481		Interoffice Memorandum re Monthly Highlights October 2001
997	1/9/2002	ABBT0569033		Calendar Entry Meeting ABT- 773 Presentation
998	2/8/2002	ABBT247733 - ABBT247737		Interoffice Memorandum re Monthly Highlights January 2002
999	4/9/2002	ABBT103547.ur - ABBT103551.ur		Interoffice Memorandum re Monthly Highlights March 2002
1000	2/5/2001	ABBT0108214 - ABBT0108370		February 2001 Leiden ABT-594 Presentation
1001	3/9/2001	ABBT004510 - ABBT0004511		E-mail thread re MMPI Program Update
1003	1/18/2001	ABBT0064814 - ABBT064817		E-mail thread re Goodwin Philanthropy
1004	11/1/2000	ABBT0107162		E-mail re Pharmacia meeting
1005	1/26/2001	ABBT144630.ur - ABBT144646.ur	Leonard 21	Analgesia Venture 2001 Plan Revised 1/26/01
1007	12/10/2001	ABBT209487 - ABBT209488	Leonard 44	Summary of 12/10/2001 PEC Meeting
1008	1/9/2002	ABBT0569033		Calendar entry meeting re ABT- 773 Presentation to Miles White
1009	1/7/2002	ABBT0559668 - ABBT0559670	Leonard 49	Interoffice correspondence re summary on development status of ABT-773
1010	11/27/2000	AUDIT 002817 - AUDIT 002829		Memorandum re Meeting Minutes

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1011	3/30/2004			Transcript of March 30, Hearing in Hancock I
1012	4/12/2004			Blewitt Letter to Tyree (Audit)
1014	5/3/2004			Desideri Letter to Davis
1015	5/6/2004			Davis Letter to Desideri
1016	5/10/2004			Desideri Letter to Davis
1017	5/11/2004			Davis Letter to Desideri
1018	6/3/2004			Desideri Letter to Davis
1019	6/15/2004			Desideri Letter to Davis
1020	6/16/2004			Davis Letter to Desideri
1021	6/23/2004			Desideri Letter to Davis
1022	11/5/2004			D'Amore Letter to Troake
1023	1/28/2005			D'Amore Letter to Davis
1024	8/5/2004			Desideri Letter to Troake
1025	3/29/2005			D'Amore Email to Davis
1026	4/21/2005			D'Amore Letter to Davis
1027	2/11/2005			D'Amore Letter to Davis
1028	2/11/2005			Davis Letter to D'Amore
1029	2/15/2005			D'Amore Letter to Davis
1030	2/15/2005			Davis Letter to D'Amore
1031	3/23/2004			Joint Statement Pursuant to Local Rule 16.1
1032	12/00/2001	ABBT120514.UR- 58.UR		December 2001 PEC Presentation re ABT-773
1033	8/30/2002			Notice of Termination of ABT-773 Abbott Notes
1034	7/30/2002			Notice of Termination of ABT-773 Hancock Notes
1035	1/9/2008			John Poulos letter to Stephen Blewitt with 3 attachments
1036	undated	JH002310 - JH002311		Research and Development Transaction Investment Analysis
1037	8/22/2001	ABBT246353 - ABBT246368		Email re outlicensing opportunities attaching introductory slides
1038	9/28/2001	ABBT0014648 - 00146657		ABT518 Selective Matrix Metalloproteinase MMP Inhibitor

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1039	9/28/2001	ABBT246248 - ABBT24652		Email re Deemer Weekly Update
1040	9/00/2001	ABBT0000381-ABBT0000388		ABT518 Matrix Metalloproteinase Inhibitor
1041	10/12/2001	ABBT246369		Email re Licensing opportunities
1042	10/26/2001	ABBT0086829		Email re ABT-518 and hematological cancer
1043	10/24/2001	ABBT246338-ABBT24644		Email re Update of ETAs Priority 1
1044	1/25/2002	ABBT0065300-ABBT0065335		Email re Goodwin Slides
1045	4/3/2002	ABBT0170011-ABBT0170014		Email re Salmedix ABT518
1046	4/6/2002	ABBT0141755-ABBT0141772		ABT518 Selective Matrix Metalloproteinase MMP Inhibitor
1047	4/16/2002	ABBT0089655		Email re Salmedix [Forwarding Jerry's Note]
1048	5/3/2002	ABBT0542887-ABBT0542892		Email re April highlights;
1049	8/2/2002	ABBT0086988		Email re ABT 518 Outlicense Status
1050	8/13/2002	ABBT0169420		Email re John Hopkins Cancer Center and Abbott Oncology Collaboration Meeting
1051	8/14/2002	ABBT0141711-ABBT0141728		Email re Johns Hopkins 8-02.ppt; ABT518 Selective Matrix Metalloproteinase MMP Inhibitor
1052	9/24/2003	ABBT0091538 -ABBT0091539		Email re ABT518 [Forwarding Prospective Licensee]
1053	2/20/2004	ABBT0167630- ABBT0167638		Nisen Spore-Taiwan trip rept, Feb 04.doc; Asia Trip Report 02/16/2004 to 02/20/2004 P. Nisen
1054	5/25/2004	ABBT0089550-ABBT0089551		Email re ABT518 [Negative Clinical Results with AG3340 and Marimastat]

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1055	2/23/2006	ABBT0014490- ABBT0014491		Project Overview ABT518 Closed ABT518 Previously in Ph 1
1056	5/31/2001	ABBT0060145		Email re Re M00235 Enrollment
1057	4/9/2001	ABBT285535-ABBT285536		Email re Portfolio Probabilities
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1059	7/2/2001	ABBT290799-ABBT290837		Email re Final 07/03/2001 Update
1060	9/19/2001	ABBT0046856-ABBT0046891		Community Pharma Portfolio Senior Management Data Review 09/19/2001 Summary Materials; Development Assets Phase 2 Probability of Technical Success
1061	9/19/2001	ABBT0046892-ABBT0046902		Pain Table of Contents
1062	00/00/2000	JHII021962-JHII021979		Monte Carlo Analysis Work Paper
1063	4/4/2001	ABBT317223-ABBT317239		Portfolio Analysis Review of Technical and Regulatory Success Probabilities
1064	11/7/2002	ABBT352502 - ABBT352504		08/00/2005 Highlights
1065	4/00/2001	ABBT0032090 - ABBT0032663		Portfolio Analysis April 2001 Review PPD and Knoll Assets Reference Materials